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## SAN FRANCISCO PLANNING DEPARTMENT

### To Interested Parties Regarding the Attached Preliminary Mitigated Negative Declaration:

A Preliminary Mitigated Negative Declaration is being sent to you because you own property adjacent to the site, or because you have expressed an interest in the proposed project or the project area. Notice of publication of this document was printed in a newspaper of general circulation on the day that this was mailed to you.

Prior to consideration of the proposed project by decision makers (which may result in either approval or disapproval), the Planning Department is required to complete an environmental evaluation. In conformance with this requirement, the Department's Major Environmental Analysis Division has evaluated the current proposal and has determined that it could not **significantly** affect the environment. A Preliminary Mitigated Negative Declaration containing this determination with supporting reasons is enclosed.

Within 20 calendar days after the date of publication indicated on the first page of the Preliminary Mitigated Negative Declaration, any person may:

1. Review the attached materials for informational purposes.
2. Make recommendations for amendment of the text. (Text may be amended to clarify or correct statements and may be expanded to include additional relevant issues or to cover issues in greater depth. This may be done without the appeal described below). - OR -
3. Appeal the determination of no significant effect in a letter that specifies the grounds for such appeal and requests that an environmental impact report (EIR) be prepared. Send the appeal letter to the Planning Department, Attention: Bill Wycko, 1650 Mission Street, Suite 400, San Francisco CA, 94103. **The letter must be accompanied by a check in the amount of \$500.00 payable to the Planning Department, and must be received by 5 p.m. on June 14, 2011.** The appeal letter and check may also be presented in person at the Planning Information Counter on the first floor at 1660 Mission Street, San Francisco.<sup>1</sup>

An appeal requires the Planning Commission to determine whether or not an EIR must be prepared, based upon whether or not the project could have a substantial adverse effect on the physical environment. If an appeal is filed, there will be a public hearing at which anyone may testify for or against the contention that an EIR is required. In the absence of an appeal, the Mitigated Negative Declaration may be made final, subject to necessary modifications, at the end of the 20 day review period.

Please note that preparation or finalization of a Mitigated Negative Declaration does not indicate a decision by the City to approve or to disapprove the proposed project. However, prior to making any such decision, the decision makers must review and consider the information contained in the Mitigated Negative Declaration.

If you have any questions concerning the attached materials or this process, please contact the planner identified as the "Agency Contact Person" on the Preliminary Mitigated Negative Declaration cover page.

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

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review by the Planning Department, the appeal fee may be reimbursed for neighborhood  
ations that have been in existence for a minimum of 24 months.

[www.sfplanning.org](http://www.sfplanning.org)

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# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Mitigated Negative Declaration

*Date:* May 25, 2011  
*Case No.:* 2010.0420E  
*Project Title:* 3155 Scott Street  
*Zoning:* NC-3 (Moderate-Scale Neighborhood Commercial District)  
40-x Height and Bulk District  
*Block/Lot:* 0937/001  
*Lot Size:* 3,436 square feet  
*Project Sponsor:* Hershey Hirschkop, Community Housing Partnership  
(415) 929-2470  
*Lead Agency:* San Francisco Planning Department  
*Staff Contact:* Andrea Contreras – (415) 575-9044  
Andrea.Contreras@sfgov.org

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
415.558.6378

Fax:  
415.558.6409

Planning  
Information:  
415.558.6377

### PROJECT DESCRIPTION:

**Project Description:** The project site is located in the Marina District of San Francisco, at the southwest corner of Lombard and Scott Streets, on the block bounded by Lombard Street to the north, Scott Street to the east, Greenwich Street to the south, and Divisadero Street to the west. The project site contains an 8,125 square-foot building that is three stories in height plus basement. The building was most recently used as a 29-room tourist hotel, with no on-site parking or open space. The proposed project would convert the former hotel into 25 units of group housing, including 24 units for transitional-age youth ages 18-24, and one unit for a resident manager. The project would include interior reconfiguration of the building for the proposed use, and minor exterior work including repainting, window replacement, and façade enhancements. The project sponsor is seeking Conditional Use authorization, and an amendment to the Planning Code to create the Lombard and Scott Street Affordable Group Housing Special Use District (SUD). The SUD would allow a higher density of group housing units (25) than currently permitted under NC-3 zoning (16), with no off-street parking, open space, or rear yard requirements.

### FINDING:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached.

Mitigation measures are included in this project to avoid potentially significant effects. See page 103 of the Initial Study.

cc: Mark Farrell, Supervisor, District 2  
Hershey Hirschkop, Community Housing Partnership

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**INITIAL STUDY**  
**3155 Scott Street**  
Planning Department Case No. 2010.0420E

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## A. PROJECT DESCRIPTION

### *Project Location and Site Characteristics*

The project site (Assessor's Block 0937, Lot 001) is located in the Marina District of San Francisco, at the southwest corner of Lombard and Scott Streets, on the block bounded by Lombard Street to the north, Scott Street to the east, Greenwich Street to the south, and Divisadero Street to the west (See Figure 1, Regional and Vicinity Location, page 2). Lot 001 is approximately 3,436 square feet and has 50 feet of frontage on Lombard Street and 62 feet of frontage on Scott Street. The parcel is occupied by an approximately 8,125-square-foot building that is 40 feet in height and contains three floors plus a basement. The parcel does not contain any rear yard or open space areas. The Scott Street side of the parcel has two white-curb passenger loading spaces, but does not contain any areas for off-street parking.

From its construction in 1914 to the end of August 2010, the building at the site was occupied by a tourist hotel, most recently named the Edward II Inn and Suites. The first floor included a reception area, a meeting space, a small pub, three suites, a breakfast room, a partial kitchen, and restrooms. The two upper floors included 26 guest rooms, 14 of which contained private bathrooms. Each of the upper floors also included a communal bathroom and shower room. The hotel had one pedestrian entrance at the corner of Lombard and Scott Streets and four other pedestrian entrances along Scott Street. The building's footprint is largely rectangular: a light well is situated at the west façade, and cantilevered corner bays project slightly at the northwest, northeast, and southeast corners. A gate along Scott Street leads to a breezeway. The building is topped by a flat roof, surrounded by a decorative parapet with vertical detailing at the visible corners, which is shaped on the north and east facades. The walls are wood frame with heavy wood posts and beams in the basement. The foundation is reinforced concrete, with continuous perimeter and interior footings. Exterior walls are clad in smooth painted stucco at the north and east facades and wood drop siding on the south and west facades. The building displays a number of interior and exterior alterations that have been performed throughout its life, including in the 1940s, 1950s, 1960s, 1980s, and 1990s.

The subject property is zoned NC-3 (Moderate-Scale Neighborhood Commercial District), which is intended to offer a variety of uses, with emphasis on businesses providing goods and services to surrounding neighborhoods in addition to the immediate neighborhood. Other districts in the areas are zoned for residential uses: RH-1 (Residential House, One-Family), RH-2 (Residential House, Two-Family), RM-1 (Residential Mixed, Low Density), RM-2 (Residential Mixed, Moderate Density), and





**Regional and Vicinity Location**

**Figure 1**





**Aerial View**

**Figure 2**



RM-3 (Residential Mixed, Medium Density); neighborhood commercial uses include NC-2 (Small-Scale Neighborhood Commercial) in addition to NC-3. The project site is in a 40-X height and bulk district ("40" denotes the maximum permitted height and "X" denotes no specific building bulk requirements).

The subject property is located in the Marina District in north-central San Francisco. The Marina District is generally bounded on the east by Van Ness Avenue and Fort Mason, on the west by Lyon Street and the Presidio National Park, on the north by San Francisco Bay, and on the south by Green Street.<sup>1</sup>

## ***Proposed Project***

### **Project Objectives**

The proposed project is to convert the building's use from a 29-room tourist hotel to 25 units of group housing,<sup>2</sup> with approximately 1,856 square feet of supportive services and community space. The manager would live in the 25<sup>th</sup> unit, which would be necessary to the other 24 group housing units, as permitted in Section 204.4(a) of the Planning Code.<sup>3</sup> For Planning Department purposes, this project meets the definition of "group housing" in the Planning Code, Section 790.88(b). Other agencies may describe the proposed development using other terms that are applicable to their respective fields. The project involves altering the interior and exterior of the building and creating the Lombard and Scott Street Affordable Group Housing Special Use District (SUD). The SUD would be required since the 25 units of group housing proposed is greater than the 16 units allowed in the density provisions of the NC-3 district.<sup>4</sup> The proposed project would provide permanent housing for transitional-age youth (ages 18 to 24), who age out of foster care, who are homeless, or who are at risk of becoming homeless.

---

<sup>1</sup>San Francisco Planning Department, 2010, Neighborhood Groups Map, available online: <http://www.sf-planning.org/index.aspx?page=1654>, accessed on January 3, 2011.

<sup>2</sup>Section 790.88 of the Planning Code defines group housing as a "residential use which provides lodging or both meals and lodging without individual cooking facilities for a week or more at a time in a space not defined as a dwelling unit. Group housing includes, but is not limited to, a rooming house, boarding house, guest house, lodging house, residence club, commune, fraternity and sorority house, monastery, nunnery, convent and ashram. It also includes group housing operated by a medical or educational institution when not located on the same lot as such institution."

<sup>3</sup>Planning Code Section 204.4(a) states that in any R, NC, or C District, one dwelling unit must serve as the residence of a manager, and the manager's family shall be permitted as an accessory use for any permitted hotel, motel, or group housing structure, without any such structure being classified as a dwelling for purpose of this code, due to the presence of such dwelling unit.

<sup>4</sup>Planning Code Section 712.92: Residential Density, Group Housing.

## **Proposed Alterations**

The project would involve interior and exterior building alterations. The project sponsor would remodel the first floor to include a lobby (approximately 400 square feet), a dining/lounge area (approximately 340 square feet), the program manager's office (approximately 75 square feet), a program room (approximately 427 square feet), a tenant service room (approximately 341 square feet), a community kitchen (approximately 73 square feet), a laundry room (approximately 100 square feet), a public restroom (approximately 75 square feet), a manager's unit (approximately 343 square feet), and storage space (approximately 25 square feet). The two upper residential floors would be renovated to create 12 bedrooms and bathrooms on each floor. The project also includes seismic and life-safety systems upgrades, cosmetic improvements, interior wall removals, new entry system, a security system (with exterior video monitoring and door/window alarms), upgrades to the sprinkler system, and minor structural stabilization in the basement. The building is currently accessible to wheelchairs through the corner entrance of Scott and Lombard Streets, but it does not have an elevator.

Accessibility improvements would be made, as required by the Mayor's Office on Disability, to ensure compliance with Title II and III of the Americans with Disabilities Act and the California State Building Code. This includes installing an elevator, which would require minor excavation of the elevator placement area; the proposed project would not require any other excavation. Further, in compliance with the Department of Building Inspection's requirements, an engineering analysis would be conducted to identify cost-efficient solutions to add seismic safety elements to the building.

Exterior alterations would include minor roof repairs and window replacement along the Scott Street and Lombard Street frontages. The exterior of the building would be repainted, and the Scott Street façade would be reconfigured to eliminate the irregular pattern of unused doors, niches, and windows, which would require a slight alteration of the sidewalk elevation along Scott Street (see Figure 12, page 15). In its place would be a continuous and functional exterior with new wainscoting and a more regular window pattern. The building entry would be relocated to a mid-block location on the Scott Street side of the building, while the corner location would be closed off. The project sponsor would provide bicycle parking spaces in the building's basement, in accordance with Planning Code Section 155.5, Bicycle Parking Required for Residential Uses, and space configuration needs.



View 1: Existing building frontage.

## ***Subject Property Photographs***

**Figure 3**





**View 2:** View to the south of the project building facade on Lombard Street.



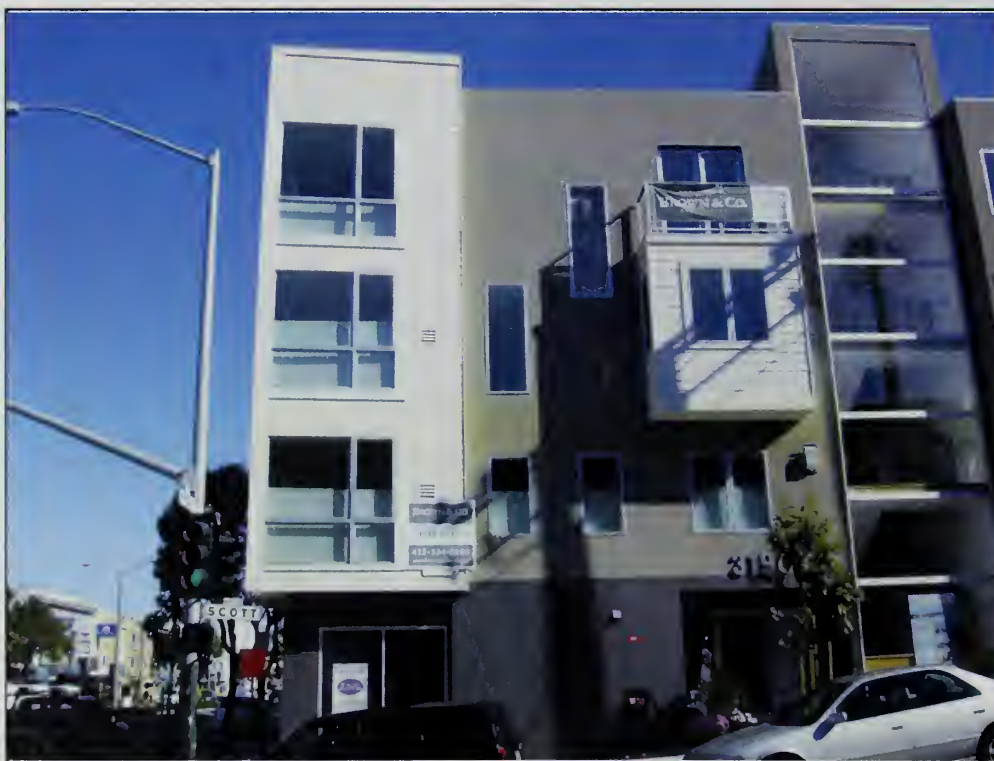
**View 3:** View to the west of the project building facade on Scott Street.

## ***Subject Property Photographs***

**Figure 4**



View 4: View to the north from project site across Lombard Street.

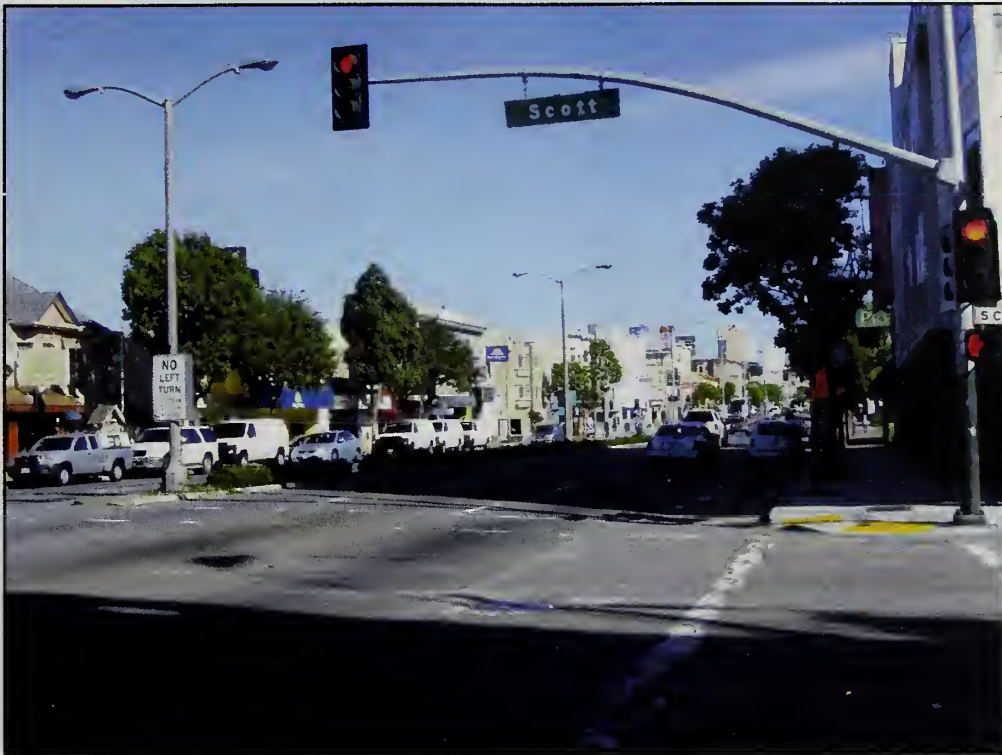


View 5: View to the east from project site across Scott Street.

## ***Subject Property Photographs***

**Figure 5**





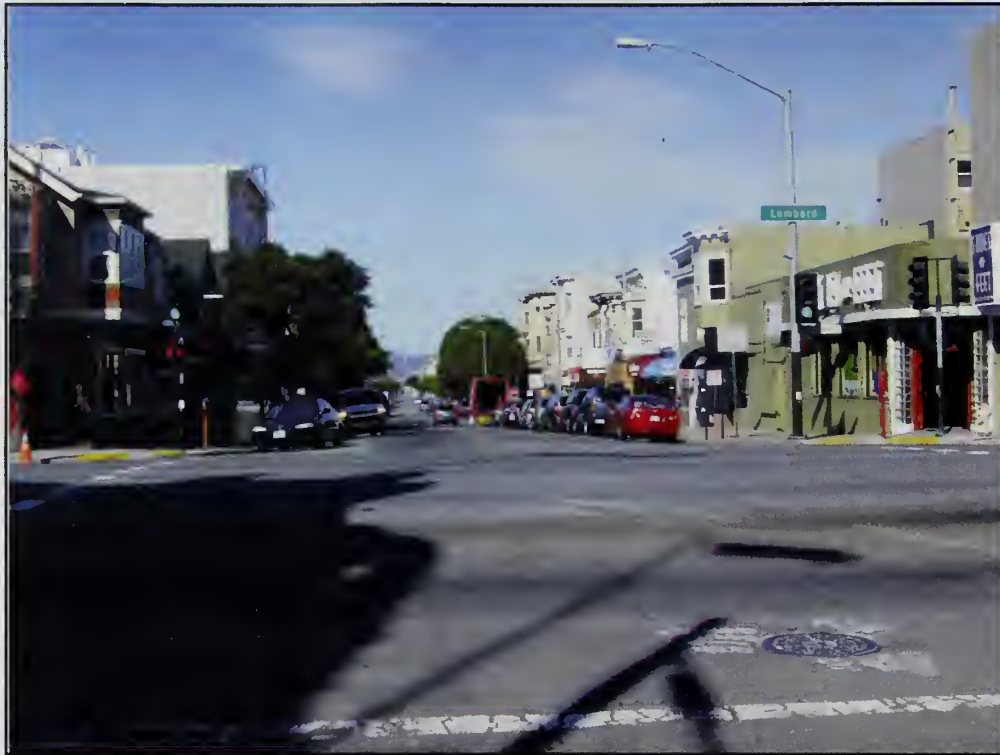
**View 6:** View to the east from project site of Lombard Street.



**View 7:** View to the west from project site of Lombard Street.

## ***Subject Property Photographs***

**Figure 6**



View 8: View to the north from project site of Scott Street.

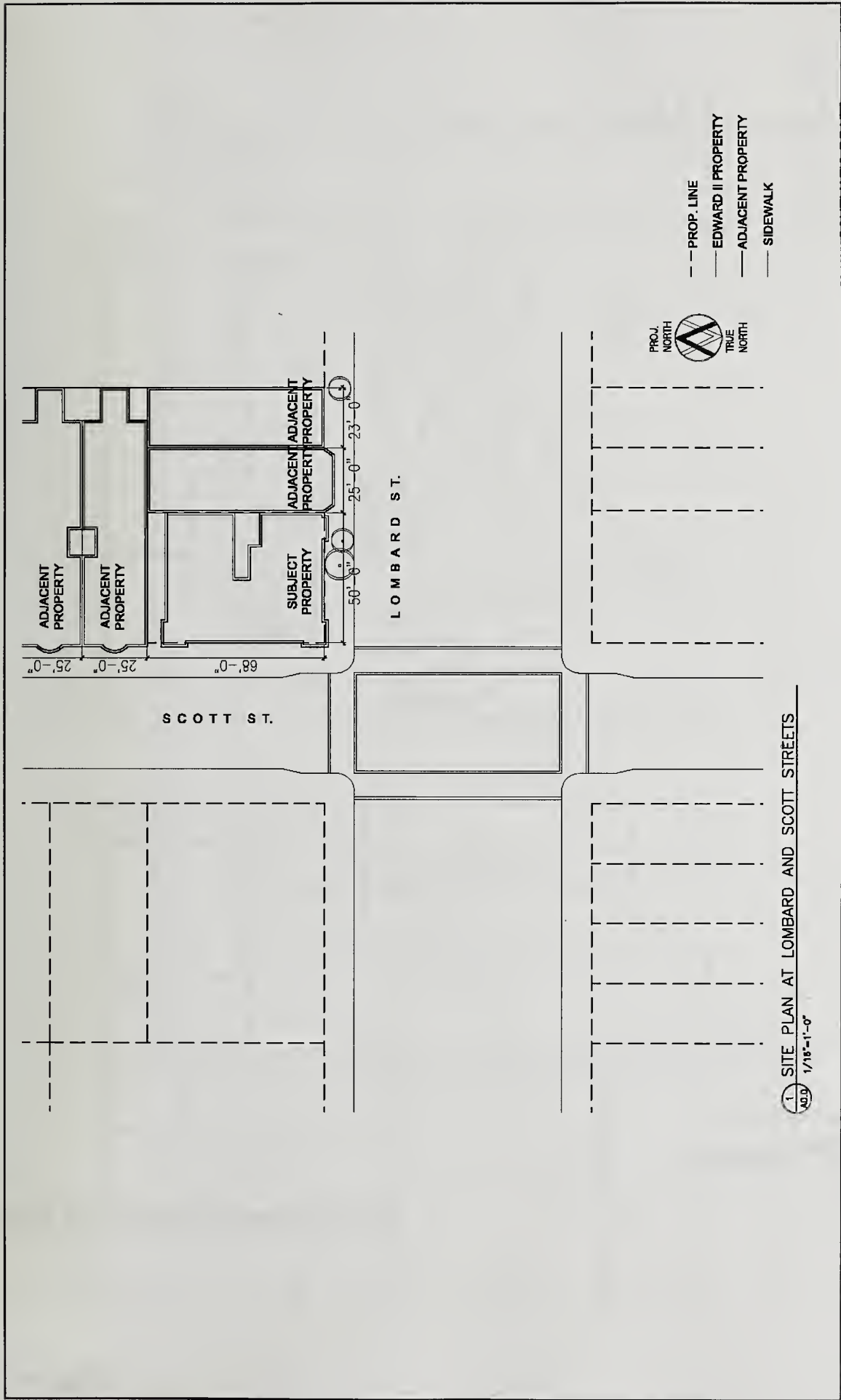


View 9: View to the south from project site of Scott Street.

## ***Subject Property Photographs***

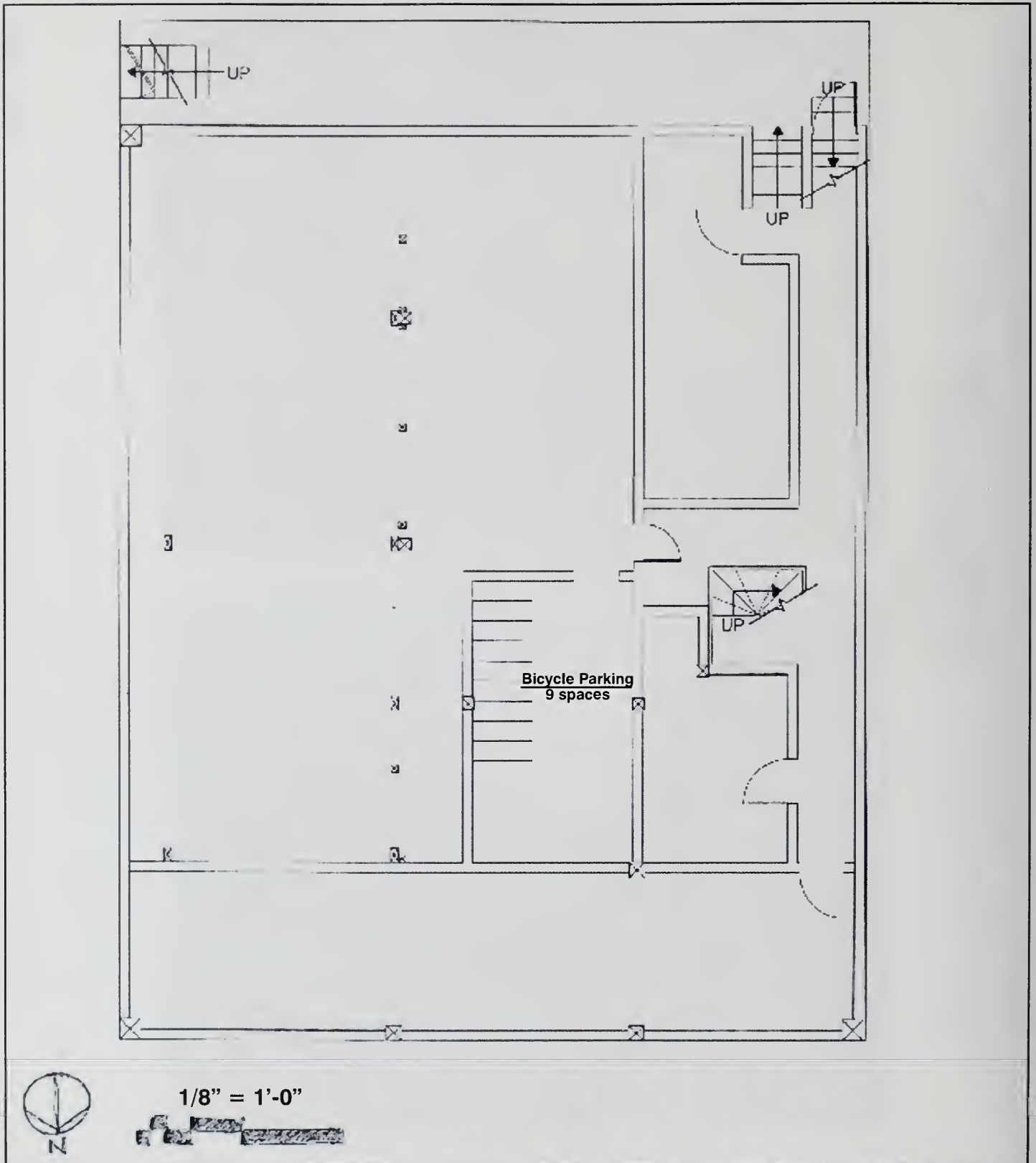
**Figure 7**





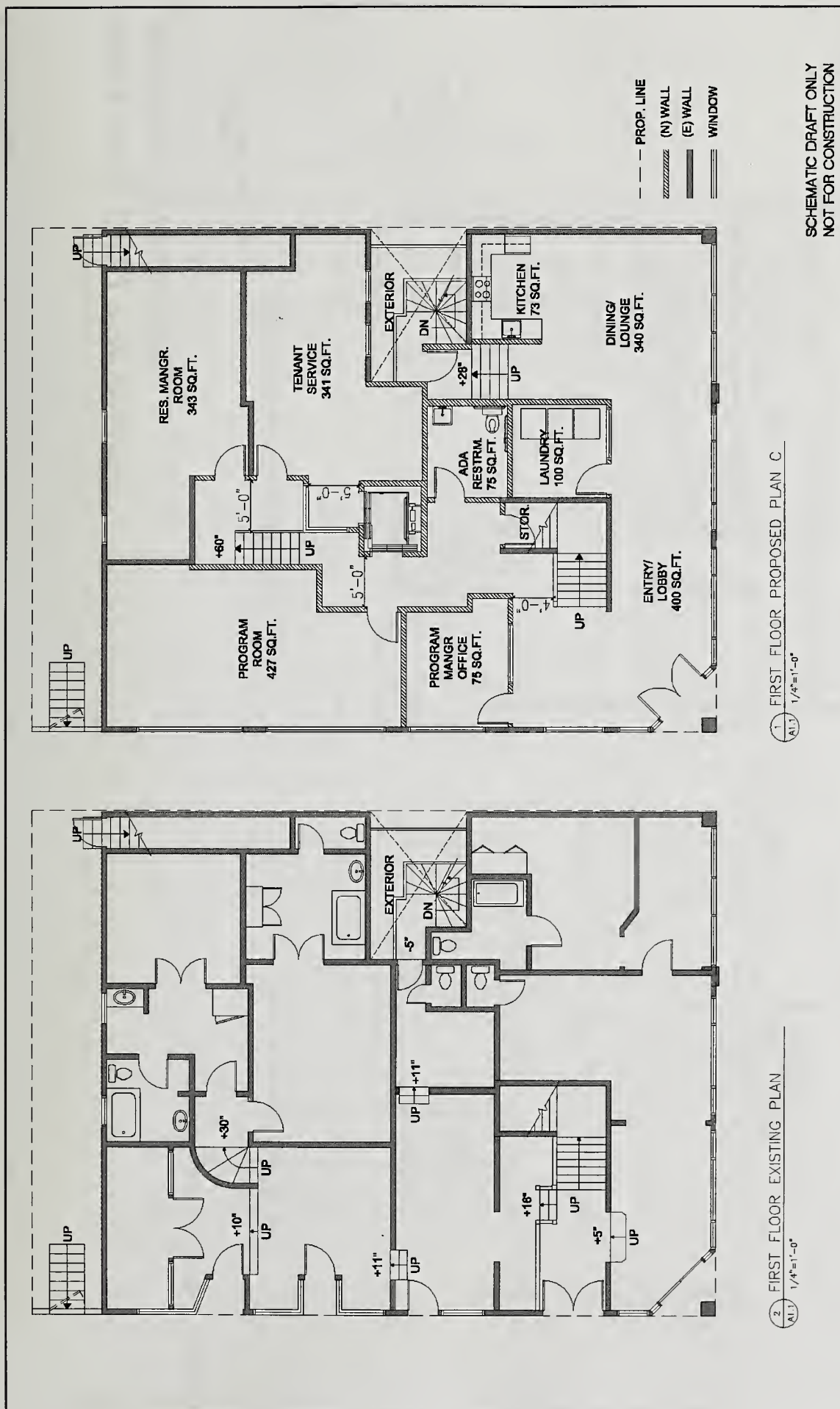
**Proposed Site Plan**

**Figure 8**

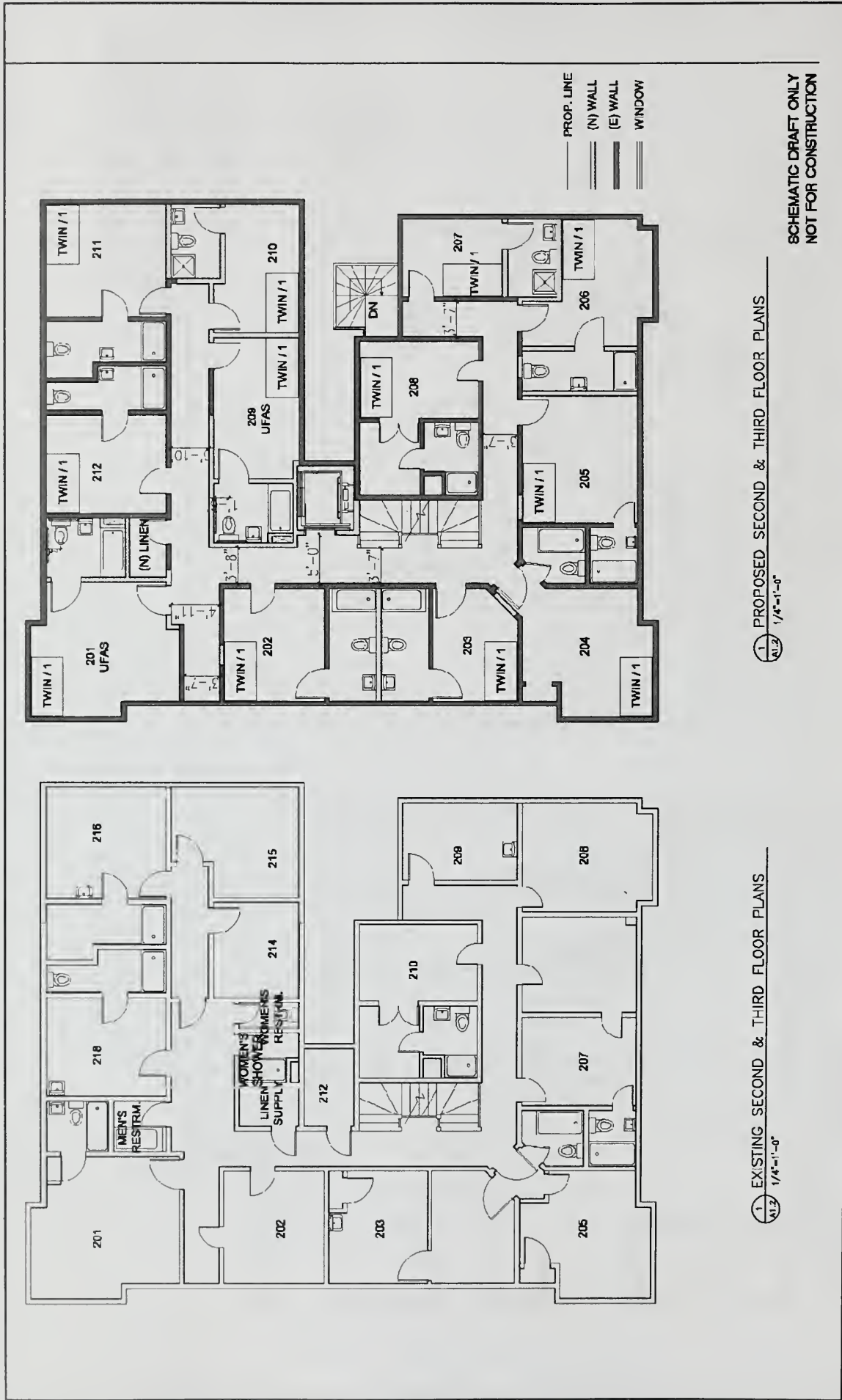


**Proposed Basement Plan**

**Figure 9**



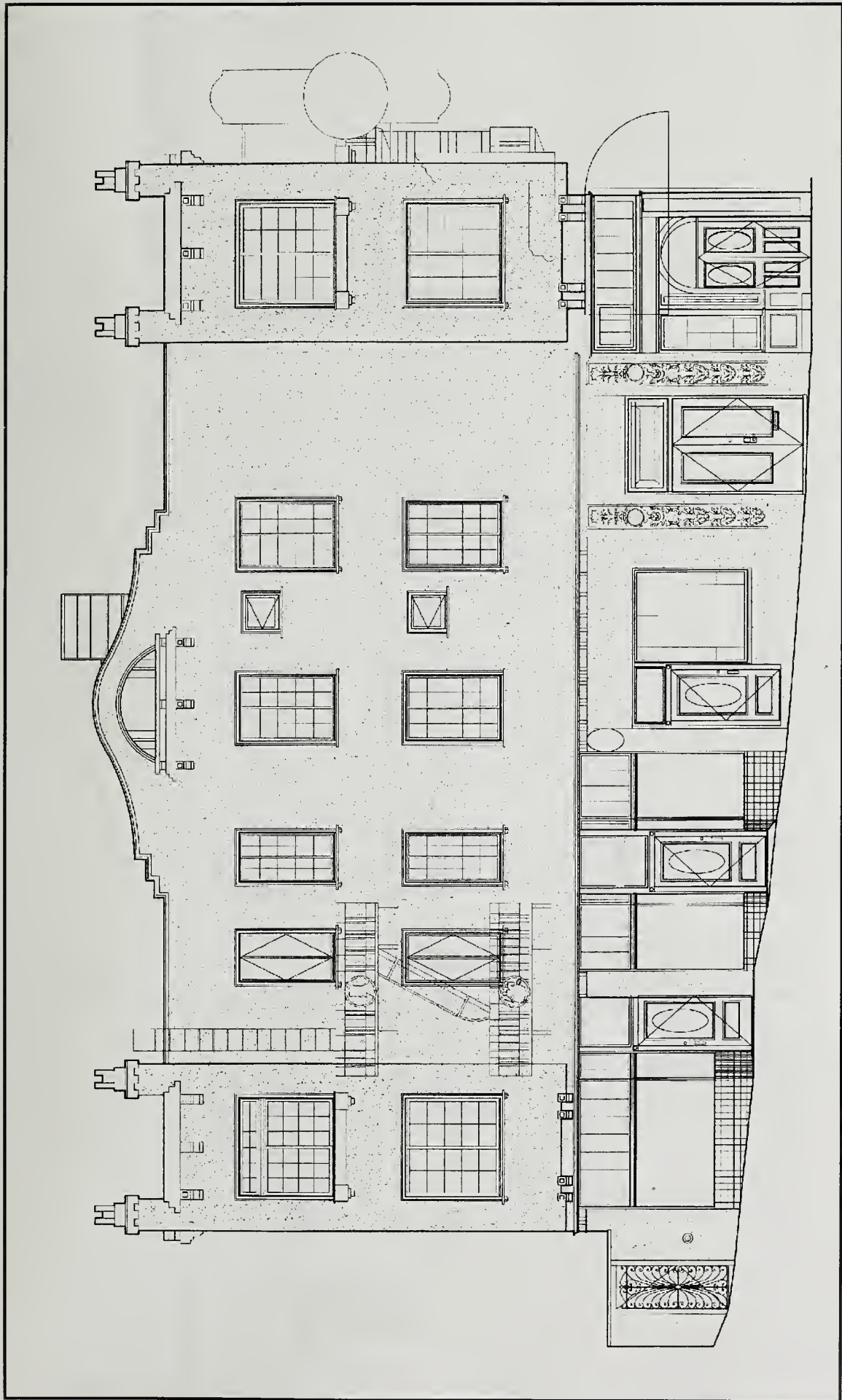
## Existing and Proposed First Floor Plans



**Existing and Proposed  
 Second and Third Floor Plans**

**Figure 11**





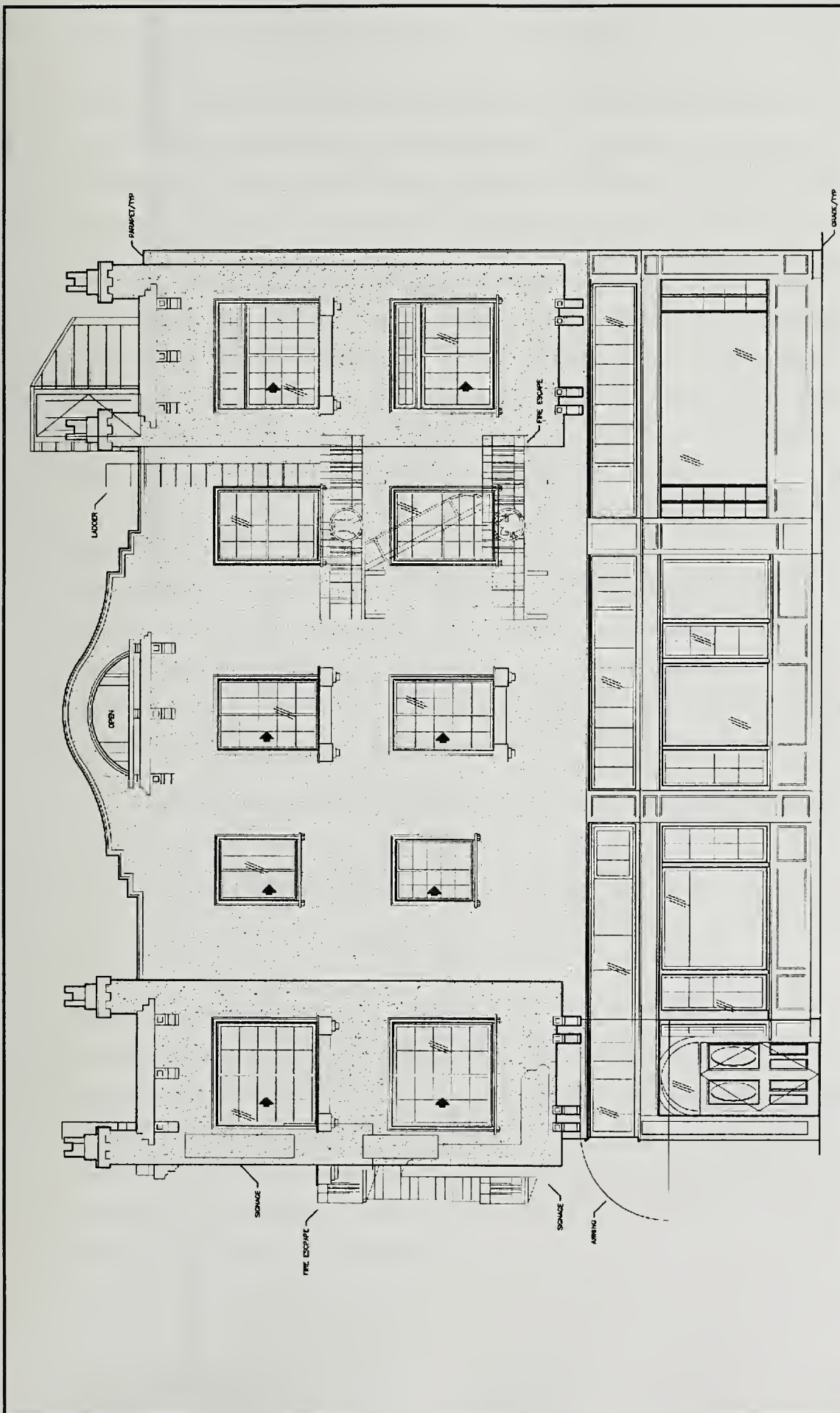
**Existing Scott Street Elevation**

**Figure 12**



***Proposed Scott Street Elevation***

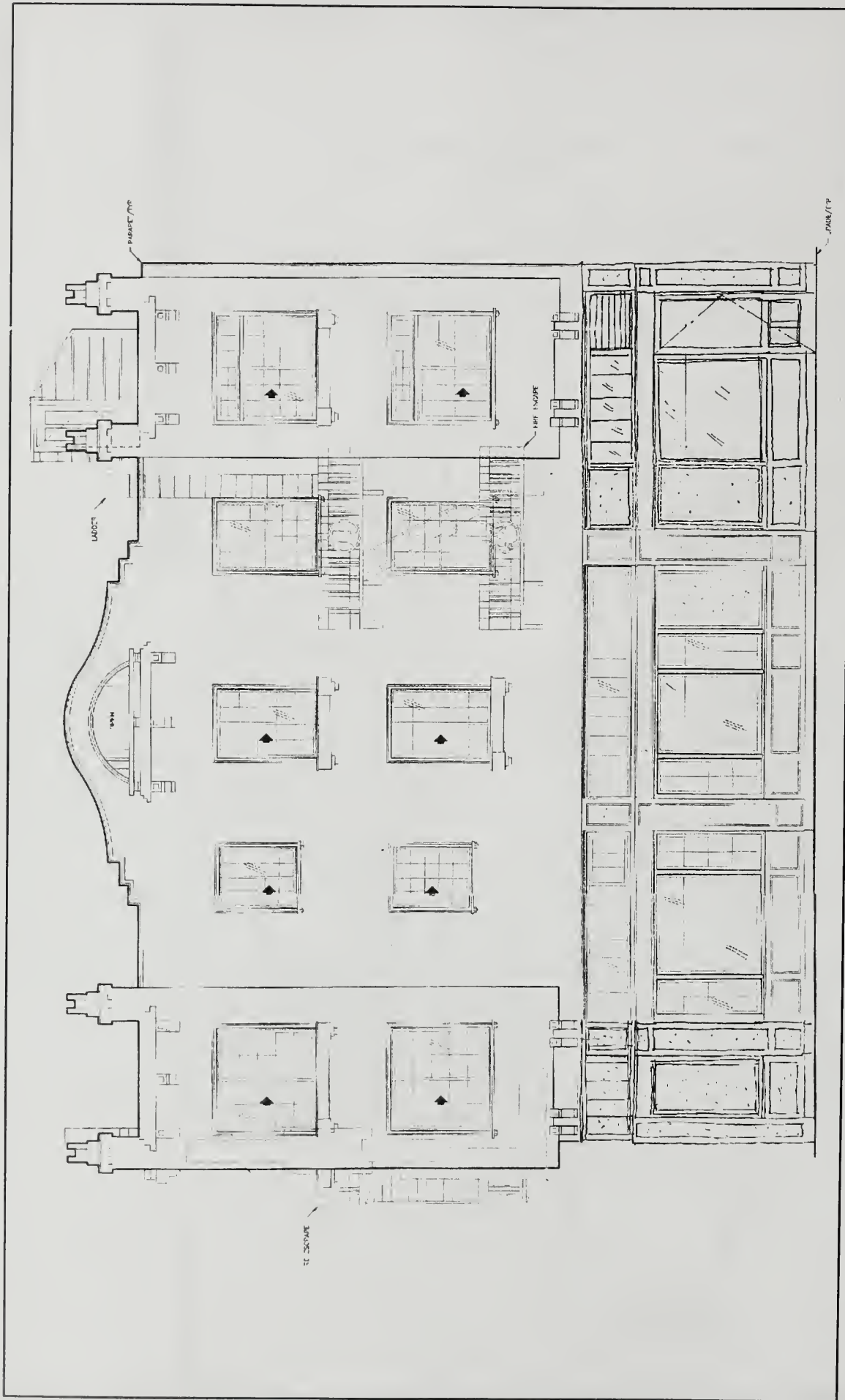
**Figure 13**



**Existing Lombard Street Elevation**

## Figure 14





**Proposed Lombard Street Elevation**

**Figure 15**



The project would meet Leadership in Energy and Environmental Design (LEED) Silver certification criteria. Project construction components would include recycled materials, where feasible. Low-water use showerheads, faucets, and other water sources would be employed, along with EnergyStar-rated appliances. In addition, green energy devices, including solar panels if feasible, would be used.

The project would include acoustical improvements to achieve an acceptable interior noise level for all proposed bedrooms and accessory interior spaces. The project would meet the California Building Code (CBC) interior noise requirement of day-night equivalent sound level (Ldn) of 45 decibels (dB) through the installation of sound-rated windows, gypsum board, and batt and blown-in insulation. Because sound-rated windows need to be closed to meet interior noise level requirements, the proposed project would include an HVAC mechanical ventilation system.

### **Special Use District**

The project site is within an NC-3 zoning district and a 40-X height and bulk district. The project sponsor is seeking to amend the Planning Code by establishing Section 249.55 to create the "Lombard and Scott Street Affordable Group Housing Special Use District." The intent of this SUD would be to provide supportive housing for transitional-age youth (ages 18 to 24), who age out of foster care, who are homeless, or who are at risk of becoming homeless. The SUD would allow the following:

- Greater on-site group housing density (25 units) than is allowed under current NC-3 zoning (16 units);
- Eliminate rear yard requirements of the NC-3 zoning district; and
- Eliminate usable open space requirements of the NC-3 zoning district.

### **Construction Period and Construction Activities**

Project construction is anticipated to start in 2012 and last approximately 10 months. Construction would typically occur Monday through Friday between 7:00 AM and 7:00 PM. Construction equipment would include scaffolding and a boom lift for exterior and roof work and dump trucks and a lift bed/conveyor truck for hauling materials and construction debris. A construction crane may be used, depending on the installation needs for the proposed elevator. Contractors would be required to comply with the City's Noise Ordinance.

## **B. PROJECT SETTING**

The project site is a rectangular parcel at the southwest corner of Scott and Lombard Streets, north of the Cow Hollow neighborhood in the Marina District of San Francisco. The project site has an elevation of 22.4 feet per the San Francisco City Datum, and slopes down in a northerly direction.

The immediate project vicinity, defined as between Chestnut Street on the north, Pierce Street on the east, Greenwich Street on the south, and Divisadero Street on the west, is relatively flat and contains a variety of building types and uses, including residential, commercial, and office. The northern portion of the immediate project vicinity (between Lombard Street and Chestnut Street) is primarily commercial, while the southern portion of the immediate project area (between Lombard Street and Greenwich Street) is primarily residential. To the west of the project site is a two-story residential over commercial building at 2417 Lombard Street, constructed in 1922. To the south of the project site is a two-story residential building at 3137 and 3139 Scott Street that was constructed in 1925. Directly across Scott Street to the east of the project site is a new 12-unit residential building. Across the street at the northerly Lombard Street/Scott Street corner at 3213 Scott Street is a two-story mixed-use building, occupied by the Republic Restaurant and Bar on the first story and residential uses on the second story. Lombard Street, as the primary gateway into San Francisco from the Golden Gate Bridge, has a concentration of businesses that serve tourist and neighborhood uses; as a result, there is a concentration of hotels and motels, in addition to restaurants and smaller office uses. Nearby commercial streets, such as Chestnut Street, serve primarily neighborhood uses, including retail stores, restaurants, bars, local bank branches, and medical/dental services. (See Figure 2 – Aerial View, page 3)

Regional access to the project site is via Lombard Street (US Highway 101), which is the northerly site frontage; the San Francisco-Oakland Bay Bridge Interstate-80 (I-80), approximately 2.6 miles southeast of the site; and I-280, approximately 4.5 miles to the southeast. The primary arterial roadways serving the site are Divisadero Street, one block west of the site; Fillmore Street, three blocks west of the site; Webster Street, four blocks east of the site; and Marina Boulevard, seven blocks north of the site. The project site is served by many local public transportation options, including bus service via Municipal Railway (Muni) Routes 22 - Fillmore, 28 - 19<sup>th</sup> Avenue, 30 - Stockton, 41 - Union, 43 - Masonic, 45 - Union-Stockton, and 76 - Marin Headlands, all within three blocks of the site.

The project site is zoned NC-3 (Moderate-Scale Neighborhood Commercial District). This zoning is intended to offer a variety of uses, with an emphasis on businesses providing goods and services to

surrounding neighborhoods in addition to the immediate neighborhood. On the surrounding streets and blocks, uses include residential and neighborhood commercial. As shown in Figure 16, the southern part of the project block is zoned RH-2 (Residential House, Two-Family) and RM-2 (Moderate Density Residential Mixed, Apartments and Houses). The zoning districts surrounding the project site include NC-3 and NC-2 (Small-Scale Neighborhood Commercial) to the north across Lombard Street; NC-3, RM-2, and RH-2 to the east along Scott Street; RH-2, RM-2, and RH-1 (Residential House, One-Family) to the south across Greenwich Street; and NC-3, RH-2, and RM-2 to the west across Divisadero Street.

Public facilities and services in the area include elementary and secondary schools, commercial establishments, transit services, medical facilities, and parks and recreation facilities. The nearest public schools are Claire Lilienthal Alternative Elementary School at 3850 Divisadero Street (0.41 mile from project site), Marina Middle School at 3500 Fillmore Street (0.44 mile from project site), and Galileo High School at 1150 Francisco Street (1.12 miles from project site).

Medical facilities in the vicinity include the University of California, San Francisco Medical Center at Mount Zion, approximately one mile south of the project site, and the Kaiser Permanente Medical Center, approximately one mile to the southwest. In addition, the University of California, San Francisco Medical Center (main campus) is approximately three miles to the southwest. Parks and recreation facilities in the area include the Presidio (0.3 mile), the Palace of Fine Arts (0.4 mile), the George Moscone Recreation Center (0.4 mile), Alta Plaza Park (0.5 mile), the Exploratorium (0.4 mile), San Francisco Bay (0.4 miles), and the Marina Green (0.5 mile).



## C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### *Planning Code and Approvals Required*

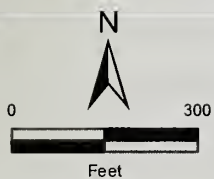
#### **Existing Zoning**

The San Francisco Planning Code, which incorporates by reference the City's zoning maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed project conforms to the Planning Code or an exception is granted in accordance with provisions of the Planning Code.

The project site is zoned NC-3 (Moderate-Scale Neighborhood Commercial District), as defined by Section 712.1 of the Planning Code. An NC-3 District offers a variety of commercial goods and services to a population greater than the immediate neighborhood, providing convenience goods and services to the surrounding neighborhoods. In addition, NC-3 Districts are defined as linear districts, located along heavily trafficked thoroughfares, which also serve as major transit routes; in the case of the project site, Lombard Street serves these purposes between Van Ness Avenue and Lyon Street and offers the mix of goods and services described in the Code. Residential group housing is a permitted use in this zoning district, with a permitted density of one bedroom per 210 square feet of lot area, as defined by Section 712.92. The NC-3 District also requires an open space area equal to 80 square feet per private residence or 100 square feet if commonly used. No off-street parking, either for the group housing units or the live-in manager's unit, is required.<sup>5</sup> The project site is in a 40-X height and bulk district. Because no expansion of the building envelope or increase in height is proposed, the project would be in compliance with the provisions of this district.

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<sup>5</sup>Planning Code Section 151: Schedule of Required Off-Street Parking Spaces, Use or activity: group housing of any kind; and Section 204.4(a): "In any R, NC, or C District, one dwelling unit to serve as the residence of a manager and the manager's family shall be permitted as an accessory use for any permitted hotel, motel or group housing structure, without any such structure being classified as a dwelling for purposes of this Code due to the presence of such dwelling unit."



**Project Area Zoning Districts**

**Figure 16**



The proposed transitional-age youth housing project would include 24 units of group housing, with an additional on-site manager's unit, for a total of 25 residential units; this would reflect the proposed group housing density of one bedroom per 138 square feet of lot area. This would be inconsistent with the density provisions set forth in Section 208, which allows for up to 16 units. In addition, the project would continue the current building's nonconformance with the rear yard and open space provisions of the NC-3 district.

### **Exceptions to the Planning Code**

The proposed project would require Zoning Map and Planning Code Text Amendments for the creation of the Lombard and Scott Street Affordable Group Housing SUD, which would overlay the existing NC-3 zoning and allow for the increased residential density required for the proposed group housing. The SUD would also address Planning Code exceptions to open space and rear yard requirements that apply to the NC-3 district. The SUD would require approval by the Board of Supervisors, on recommendation of the Planning Commission and in accordance with Planning Code Sections 302 and 306, Amendments to the Planning Code. Should the Board of Supervisors approve the proposed SUD, the project would conform to the density requirements and related land use provisions of the SUD.

### ***Adopted Plans and Goals***

#### **San Francisco General Plan**

The San Francisco General Plan provides general policies and objectives to guide land use decisions. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with General Plan policies that do not relate to physical environmental issues will be considered by decision makers as they decide whether to approve or disapprove the project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project.

#### **Regional Plans**

Environmental plans and policies, including the *Bay Area 2010 Clean Air Plan*, directly address physical environmental issues and contain standards or targets that must be met in order to preserve or improve



specific components of the city's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plans or policies.

### **The Accountable Planning Initiative**

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the Planning Code to establish eight priority policies. These policies, and the sections of this environmental evaluation addressing the environmental issues associated with the policies, are preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character (Question 1c, Land Use); preservation and enhancement of affordable housing (Question 3b, Population and Housing); discouragement of commuter automobiles (Questions 5a, b, and f, Transportation and Circulation); protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); maximization of earthquake preparedness (Questions 14a-d, Geology and Soils); landmark and historic building preservation (Question 4a, Cultural Resources); and protection of open space (Questions 9a and b, Wind and Shadow, and Questions 10a and c, Recreation and Public Space).

The City is required to find that the proposed project or legislation is consistent with the priority policies. It must do this before issuing a permit for any project that requires an initial study under the California Environmental Quality Act (CEQA), before issuing a permit for any demolition, conversion, or change of use, and before taking any action that requires a finding of consistency with the General Plan. As noted above, the consistency of the proposed project with the environmental topics associated with the priority policies is discussed in Section E of this document, Evaluation of Environmental Effects, providing information for use in the case report for the proposed project. The case report and approval motions for the project would contain the San Francisco Planning Department's comprehensive project analysis and findings regarding consistency of the proposed project with the priority policies.

### ***Project Approvals***

The project would require approval from the San Francisco Board of Supervisors, on recommendation of the Planning Commission, to amend the Planning Code by establishing Section 249.55, the "Lombard and Scott Street Affordable Group Housing Special Use District". The project sponsor would seek a Conditional Use authorization from the Planning Commission to implement the SUD. As

previously stated, the intent of the SUD would be to provide housing and services to meet the needs of youth ages 18 to 24, who are transitioning out of foster care housing. The SUD would allow for a greater residential density than that allowed for the current NC-3 zoning and would waive both open space and rear yard requirements applicable to the NC-3 zoning district.

Subsequent to these recommendations and approvals by the Planning Commission and the Board of Supervisors, respectively, the project would require building permits. These would require review and approval by the Planning Department and the Department of Building Inspection. Curb or street modifications, including on-street loading spaces, would require approval by the Department of Parking and Traffic and the Department of Public Works.

#### **D. SUMMARY OF ENVIRONMENTAL EFFECTS**

The proposed project could affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Land Use                         | <input checked="" type="checkbox"/> Air Quality        | <input type="checkbox"/> Biological Resources               |
| <input type="checkbox"/> Aesthetics                       | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Geology and Soils                  |
| <input type="checkbox"/> Population and Housing           | <input type="checkbox"/> Wind and Shadow               | <input type="checkbox"/> Hydrology and Water Quality        |
| <input type="checkbox"/> Cultural and Paleo.<br>Resources | <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Hazards/Hazardous Materials        |
| <input type="checkbox"/> Transportation and Circulation   | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mineral/Energy Resources           |
| <input type="checkbox"/> Noise                            | <input type="checkbox"/> Public Services               | <input type="checkbox"/> Agricultural and Forest Resources  |
|   |  | <input type="checkbox"/> Mandatory Findings of Significance |

All items on the initial study checklist that have been checked "Less Than Significant Impact," "No Impact," or "Not Applicable," indicate that, on evaluation, staff have determined that the proposed project could not have a significant adverse environmental effect relating to that topic. A discussion is included for those issues checked "Less Than Significant Impact" and for most items checked "No Impact" or "Not Applicable." For each checklist item, the evaluation has considered the impacts of the proposed project, both individually and cumulatively.

## E. EVALUATION OF ENVIRONMENTAL EFFECTS

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>1. LAND USE AND LAND USE PLANNING— Would the project:</b>					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the <i>General Plan</i> , specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any adopted habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project would have significant land use impacts under CEQA if it were to physically divide an established community, to conflict with any applicable land use plans or policies, or to substantially affect the character of the vicinity.

The project site is in the Marina District of San Francisco, in an urban and developed area. The site is at the southwest corner of Lombard and Scott Streets, on the block bounded by Lombard Street on the north, Scott Street on the east, Greenwich Street on the south, and Divisadero Street on the west (see Figure 1, Regional and Vicinity Location, page 2). The proposed project would change the use of the building from a 29-room tourist hotel to 25 units of group housing, with approximately 1,856 square feet of supportive services and community space. The project would involve altering the interior and exterior of the building. The project site is in an NC-3 zoning district and a 40-X height and bulk district. The project sponsor is seeking to amend the Planning Code by establishing the Lombard and Scott Street Affordable Group Housing SUD. The 40-foot-tall project site building consists of three stories plus basement.

### **Impact LU-1: The proposed project would not conflict with or physically divide an established community. (No Impact)**

The proposed project would change the use of the building from a 29-room tourist hotel to 25 units of group housing with approximately 1,856 square feet of supportive services and community space. This change in use would not present a physical barrier to movement through the surrounding area. The project would be constructed within the existing lot boundaries and would involve the reconfiguration



of the building interior without significantly altering its exterior envelope. The project would not interfere with or change the street pattern or impede the passage of persons or vehicles. The surrounding uses and activities would continue on their own sites and would relate with each other as they do at present. The surrounding established community would continue the same pattern of commercial and residential uses. For these reasons, the proposed project would not physically divide an established community and **no impact** would occur.

**Impact LU-2: The proposed project would be consistent with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)**

As discussed in Section C, Compatibility with Existing Zones and Plans, page 22, the project would be consistent with adopted local and regional plans, policies, and goals. In addition, environmental plans and policies are those, like the *Bay Area 2010 Clean Air Plan* that directly address environmental issues or contain targets or standards that must be met to preserve or improve characteristics of the City's physical environment. The proposed project would not conflict with any such adopted environmental plan or policy. While the allowable residential density would increase, it would be incremental and consistent with current area density, therefore, not significant. Thus, the proposed project does not have the potential to conflict with any such plan or policy adopted to mitigate an environmental effect. As such, impacts of the proposed project related to consistency with plans and zoning would be **less than significant**.

**Impact LU-3: The proposed project would not have a substantial impact upon the existing character of the project vicinity. (Less than Significant)**

The proposed project would change the current use of the building from a 29-room tourist hotel to a 25-unit group housing, with approximately 1,856 square feet of supportive services and community space. The proposed project would add permanent residents, however, this use is allowed under the current zoning and is consistent with the mix of land uses in the vicinity. The project would include alterations to the exterior of the building; however, these alterations would be minor and would involve modifying ground floor windows and bay configuration, new paint at the prominent vertical facades, and a new entry with awning. The project would also reconfigure window and door openings of the façades along Scott Street, as described on page 5, "Proposed Alterations". The exterior

appearance would therefore be more residential in character, and would be in relative harmony with the overall character of the vicinity.

The intensity and density of use of the building would be consistent with the mixed-use character in the neighborhood, which includes residential, office, retail, and hotel uses. The project site is in NC-3 zoning, which generally allows one dwelling unit<sup>6</sup> per 600 square feet of lot area. In addition, this zoning allows for one bedroom of group housing per 210 square feet of lot area; for this site, up to 16 group-housing units would be allowed. As 25 units of group housing are proposed, this would increase the group housing density, but the net number of rooms would decrease from 29 hotel rooms. While the proposed project, through establishment of an SUD, would increase the group housing density on-site, this increase alone would not constitute a significant land use impact or have a demonstrable negative effect on the character or quality of the neighborhood.

The proposed project would result in a new land use for the neighborhood by introducing group housing for transitional-age youth. The project would extend residential uses to the already mixed-use character of the area onto the project site, and would be typical of the range of residential densities found within the vicinity. The nature and intensity of proposed land use is consistent with the character of development that exists in the area. While the proposed project would result in a change of use to permanent housing and an increase in group housing density, its impacts on land use would be **less than significant** under CEQA.

**Impact LU-4: The proposed project, in combination with past, present, or reasonably foreseeable future projects in the vicinity, would result in less than significant cumulative land use impacts. (Less than Significant)**

The proposed project would not present a physical barrier to movement through the surrounding area and would thus not physically divide the surrounding established community. The project would increase the intensity of land use in the project area but would have a less than significant impact on the mixed-use character of the area. Further, there are a number of proposed projects within the project area that would lead to a slight increase in residential development in the project area. The proposed project at 2353 Lombard Street would replace a two-story restaurant with a three-story building, with 21 residences above, commercial spaces on the ground floor, and underground parking. The proposed

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<sup>6</sup>The Planning Code defines a dwelling unit as a room or suite of two or more rooms that is designed for, or is occupied by, one family doing its own cooking therein and having only one kitchen.

project at 2774-2776 Filbert Street would construct a vertical addition (new fourth floor) to an existing three-story, two-unit building resulting in a four-story, two-unit building. However, these residential additions would not be considered a substantial addition to the projected residential housing stock in the area and would not change the character of this mixed-use area. Therefore, cumulative development of these projects would not make a significant contribution to cumulative land use impacts in the project area or the City as a whole. In conclusion, the proposed project would not result in significant individual or cumulative land use impacts and the project's contribution to cumulative land use impacts would be **less than significant**.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>2. AESTHETICS—Would the project:</b>					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A visual quality analysis is somewhat subjective and considers the project design in relation to the surrounding visual character, heights and building types of surrounding uses, its potential to obstruct scenic views or vistas, and its potential for light and glare. The proposed project would have significant aesthetic impacts under CEQA if it were to affect scenic vistas, damage scenic resources, degrade the visual character of the area, or create a new source of substantial light or glare. The proposed project, a change of use, creation of an SUD, and alterations that would not change the building envelope, would not result in such impacts.



**Impact AE-1: The proposed project would not result in any adverse impact on scenic views and vistas. (No Impact)**

The proposed project would not change the exterior envelope of the building, except for minor exterior alterations to the building. These alterations consist of reconfiguring windows and door openings along Scott Street, reconfiguring ground floor windows and bays, painting the prominent vertical facades, and installing a new entry. Further, there are no formally designated scenic views, viewpoints, or trails at or near the project site. Views from the project are of Lombard Street, in both easterly and westerly directions, and Scott Street, in both northerly and southerly directions. The buildings seen along Lombard Street in both directions are primarily commercial and ground-floor commercial with upper-floor residential, with the exception of a residential condominium building fronting Lombard Street in the westerly direction, across from the project site. The height and scale of most buildings are similar to that of the project site, primarily consisting of two to three stories, with building heights up to 40 feet. The views of Scott Street in the northerly direction consist primarily of ground-floor commercial and upper-floor residential in two- to three-story buildings, similar in scale to the project site. The views along Scott Street, in the southerly direction, are primarily three- to four-story residential buildings of slightly larger scale in both height and bulk than the building at the project site. Views of the project site from nearby vantage points show the building within the overall neighborhood scale, in both height and bulk, relative to neighboring buildings along both Lombard and Scott Streets. In addition, the project would not increase the building's height or bulk; therefore, no change in the current visual setting would occur. Thus, the proposed project would not affect scenic views or vistas now observed from public areas. As such, the proposed project would have **no impact** on scenic vistas.

**Impact AE-2: The proposed project would not damage any scenic resources. (No Impact)**

There are no scenic resources on the project site that contribute to a scenic public setting in the project vicinity. Public views from the project site include US Highway 101 along Lombard Street and similar size buildings along Lombard and Scott Streets. Therefore, the proposed project would have **no impact** on scenic resources of the built or natural environment.

**Impact AE-3: The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings. (No Impact)**

The exterior alterations that are part of the proposed project include reconfiguring windows and door openings along Scott Street, reconfiguring ground floor windows and bays, applying new paint at the prominent vertical facades, and installing a new entry. The exterior appearance would not change substantially. As such, the proposed project would not substantially degrade or affect the existing visual character or quality of the site and its surroundings. Therefore, there would be **no impact** on existing visual character or quality of the site and its surroundings.

**Impact AE-4: The proposed project would not result in a new source of light and glare and would not affect day or nighttime views in the area and other people or properties. (Less than Significant)**

The exterior lighting at the building would be positioned to minimize glare, especially to passing pedestrians. The project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Light and glare impacts would not have a substantial, demonstrable, negative aesthetic impact. Therefore, the exterior façade treatments and new project lighting would have a **less than significant impact** from light and glare.

**Impact AE-5: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project vicinity, would result in a less than significant impact on aesthetic resources. (Less Than Significant)**

The project would alter the interior use of an existing building. No additional height or bulk would be added to the building, and all exterior modifications would be minor and would not result in sources of light or glare that would significantly impact land uses in the vicinity. Developments in the project area might impact aesthetic resources near the project site. However, as discussed above, the proposed project would not change the visual character of the project area and so would not contribute to any cumulatively considerable change in aesthetics. Therefore, there would be a **less than significant** on aesthetics, both project specific and cumulative.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>3. POPULATION AND HOUSING— Would the project:</b>					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Under CEQA criteria, a project would have significant impacts on population and housing if it were to substantially increase population, displace housing, create a demand for additional housing, or displace a substantial number of people.

The proposed project would change the current use of the building from a 29-room tourist hotel to 25 units of group housing, with approximately 1,856 square feet of supportive services and community space. There would be a total of eight employees at the project site: a full-time live-in manager and seven support staff.

**Impact PH-1: The proposed project would not induce substantial population growth, either directly or indirectly. (Less than Significant)**

In general, a project would be considered growth inducing if its implementation would substantially increase the population or result in the need for additional development, which might not occur if the project were not implemented. The proposed project would change the current use of the building from a 29-room tourist hotel to 25 units of group housing, with approximately 1,856 square feet of supportive services and community space. There would be 25 residents for the completed project and eight employees, including a full-time live-in resident manager, and seven support staff. This would result in a total of 32 people in the project area. According to data from the 2000 Census,<sup>7</sup> the population of the 94123 ZIP Code, which approximately conforms to the Marina neighborhood

<sup>7</sup>United States Census Bureau, 2009 American Community Survey/Puerto Rico Community Survey Group Quarters Definitions. Internet website: [http://www.census.gov/acs/www/Downloads/data\\_documentation/GroupDefinitions/2009GQ\\_Definitions.pdf](http://www.census.gov/acs/www/Downloads/data_documentation/GroupDefinitions/2009GQ_Definitions.pdf). Accessed December 28, 2010.



boundary, is 22,903, representing 14,851 households. In addition, 54 persons were identified as living in group housing.<sup>8</sup> The residential population increase would represent an approximate 0.11 percent increase in the resident population of the Marina neighborhood. This increase would be **less than significant** and would not generate a substantial demand for housing in the context of citywide population or employment growth.

Until its closure in 2010, the Edward II Inn and Suites contained 29 guest rooms and employed approximately four people. Between 2005 and 2009, the annual average hotel occupancy rate in San Francisco was 77.1 percent.<sup>9</sup> The average occupancy of a hotel close to the project site is approximately 70 percent.<sup>10</sup> Therefore, the assumption is that the Edward II Inn and Suites contained an approximate average of 20 transient guests during this period. The 25 residents of the proposed project would be living at the project site on a permanent basis. Therefore, in general the proposed project may increase the population density within the project area. However, the higher density in population would be negligible, relative to the existing population in the project area. Further, population effects of the proposed project are not expected to extend beyond the project site. The project would not directly or indirectly increase population significantly; therefore, project-related impacts on population growth would be **less than significant**.

**Impact PH-2: The proposed project would not displace housing units, create a demand for additional housing, or displace a substantial number of people, necessitating the construction of replacement housing elsewhere. (No Impact)**

The project would replace a hotel with a residential project for transitional-age youth. No housing units would be displaced, and the project would have no impact on the displacement of people. In addition, the loss of approximately four employees at the hotel would be offset by the eight employees who would work at the proposed project. This would result in a net increase of four jobs at the project site. Further, employees for the proposed project are expected to be already living in San Francisco and would not require new housing. Overall, the proposed project would result in **no impact** on displacement of people, displacement of housing units, or the creation of demand for additional housing.

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<sup>8</sup>US Census Bureau, 2000 Census, ZIP Code Tabulation Area-94123. From Internet website: [http://factfinder.census.gov/servlet/SAFFacts?\\_zip=94123](http://factfinder.census.gov/servlet/SAFFacts?_zip=94123). Site accessed on January 24, 2011.

<sup>9</sup>San Francisco Convention and Visitors Bureau. 2011. *San Francisco Citywide Hotel Occupancy Rate*. From Internet Web site: [www.sfcvb.org/research](http://www.sfcvb.org/research). Site Accessed on: January 24, 2011.

<sup>10</sup>Bond, Gabriela. 2011. Golden Gate Inn. Personal Communication with Rima Ghannam at Tetra Tech, Inc. January 24, 2011.

**Impact PH-3: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project vicinity, would result in less than significant cumulative impacts on population and housing. (Less than Significant)**

The project would increase the residential population in the Marina District by approximately 0.11 percent, according to figures and data from the 2000 Census. While this may be noticeable to adjacent neighbors, this increase of less than one percent would not substantially change the existing area wide population characteristics, and the resulting density would not exceed levels that are common and accepted in urban areas, such as San Francisco. Construction of the proposed project is not expected to generate substantial growth or concentration of population in the project area, which is already populated with residential and commercial buildings. In addition, the project would not displace any residents. Other developments within the project area, such as the proposed residential developments at 2353 Lombard Street and at 2774-2776 Filbert Street, would result in a slight increase in residents and employees. Further, the proposed project would not contribute significantly to any cumulative impacts on population and housing. Overall, cumulative population and housing impacts are less than significant. Therefore, impacts of the proposed project on population and housing, both individually and cumulatively, are considered **less than significant**.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>4. CULTURAL RESOURCES— Would the project:</b>					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Under the CEQA criteria, a project would have significant impacts on cultural resources if it were to impact a historical resource, cause a substantial change to the significance of an archaeological resource, destroy a paleontological resource or unique geologic feature, or disturb any human remains.

The proposed project would entail minor exterior alterations and minor excavation within the area for placement of the elevator.

**Impact CP-1: The proposed project would not result in a significant impact on historic architectural resources. (No Impact)**

Historical resources are those properties that meet the terms of the definitions in Section 21084.1 of the CEQA statute and Section 15064.5 of the CEQA Guidelines. Historical resources include properties listed on, or formally determined eligible for listing on, the California Register of Historic Resources (California Register) or those listed in an adopted local historic register. "Local historic register" refers to a list of resources that are officially designated or recognized as historically significant by a local government by resolution or ordinance. Historical resources also include resources identified in a historical resource survey as meeting specific criteria. Additionally, properties that are not listed but are otherwise determined to be historically significant based on substantial evidence would also be considered historical resources. The determination of whether a building may be a historical resource is associated with California Register criteria, which include events (Criterion 1), persons (Criterion 2), architecture (Criterion 3), and information potential (Criterion 4), or if it is determined to contribute to a historic district or context. To be a historical resource under CEQA, a property must be shown to be not only significant under California Register criteria, but it also must retain sufficient integrity from the period of significance. A resource that is officially designated or recognized as significant on a local register of historical resources or one that is significant under the Public Resources Code, Section 5024.1(g), also is presumed to be significant under CEQA "unless the preponderance of evidence demonstrates that the resource is not historically or culturally significant."

The project site is located in the Marina District of San Francisco. The Marina neighborhood was originally marshland but was filled following the 1906 San Francisco earthquake and fire. The neighborhood began to be developed during and after the 1915 Panama-Pacific International Exposition. Residential development dominated the early 1920s, and commercial development, especially along Lombard Street, accelerated following the opening of the Golden Gate Bridge in 1937. Lombard Street was widened and became the primary thoroughfare for access to and from the bridge.



The Lombard Street corridor began to fill with commercial establishments, including motels and businesses related to autos, servicing the burgeoning tourist trade to such nearby destinations as Fisherman's Wharf, the Palace of Fine Arts, and the Presidio and to destinations north of the Golden Gate Bridge. The Marina District is currently characterized by multiple-unit apartment buildings, intermixed with single-family dwellings and commercial buildings along Chestnut and Lombard Streets. The predominant architectural styles are Mediterranean or Spanish Revival, with a handful of Exotic Revival buildings.

Under CEQA guidelines a resource that is not formally listed or identified as eligible in a state or local survey will be considered historically significant if it meets the criteria for listing on the California Register, or if it is determined to contribute to a historic district or context. The subject property's historical determination, summarized below, is based on a Historic Resources Evaluation Report (HRER),<sup>11</sup> prepared for the building at the project site, and on the San Francisco Planning Department staff concurrence with the significance findings of the HRER. The building is not listed on any local, state, or federal registries and is not listed on any historical resource surveys. The preparers of the HRER have concluded that the building did not appear to be eligible for listing on the California Register under any of the four criteria. The Planning Department staff concurred with this conclusion and determined that the site and structure were ineligible for listing on the California Register.<sup>12</sup>

The building at 3155 Scott Street is indirectly associated with both the Panama Pacific International Exposition and the opening of the Golden Gate Bridge by its location and construction date. However, the building does not strongly represent the development of or events of the fair or the bridge opening. Both events are better represented by other extant buildings and structures in the city. Thus, the subject building does not appear to be eligible for listing under Criterion 1. Research did not indicate that any of the owners or others associated with the building were historically important persons. Thus, the building does not appear to be eligible for listing under Criterion 2.

The building at 3155 Scott Street was designed by Charles J. Rousseau but is not a strong representative of his work due to extensive alterations. The building is not a strong representative of the Spanish

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<sup>11</sup>Architectural Resources Group, *Historical Resources Evaluation Report for 3155 Scott Street, San Francisco*, May 19, 2010. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.

<sup>12</sup>San Francisco Planning Department, *Historic Resource Evaluation Response, 3155 Scott Street*. June 17, 2010. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.

Revival style or hotel building type from the early twentieth century. Therefore, the building does not appear to be eligible for listing under Criterion 3 as an individual resource, nor does the building appear to be eligible for listing as a contributor to a potential historic district.

Although Criterion 4 is primarily used for archaeological resources, the building at 3155 Scott Street is not likely to yield information important to prehistory or history and does not appear to be significant under Criterion 4. Further, the HREER concluded that the building does not retain sufficient integrity to be eligible for listing on the California Register. The building retains integrity of location, association, workmanship, and feeling but does not retain sufficient integrity of design, setting, or materials to convey historical significance. This is due primarily to the demolition of approximately one-fifth of the building's original volume, the alterations of its storefronts, and the widening of Lombard Street. Further, the building does not appear to be eligible for listing as a contributor to a potential historic district. The building does not appear to be in a California-Register-eligible historic district, nor is it close to any eligible historic resources. Therefore, the building is not a historic resource. As a result, the proposed project, including any exterior alterations, would have **no impact** on historic resources.

**Impact CP-2: The proposed project would not result in a damage to, or destruction of, archaeological resources and would not disturb human remains. (No Impact)**

No major site excavation or grading is proposed for the project. Ground disturbance of up to three feet below ground surface would be required to install the building's elevator, but the proposed project would not require subsurface excavation beyond a depth of three feet. The Planning Department staff determined in their Preliminary Archeological Review, dated June 21, 2010, that there are no expected significant archeological resources within effected soils. As such, there would be **no impact** on archaeological resources or human remains.<sup>13</sup>

**Impact CP-3: The proposed project would not result in damage to, or destruction of, paleontological resources. (No Impact)**

There are no known paleontological resources or geological features at the project site, and there would be no requirement for excavation, grading or subsurface foundation work beyond a depth of three feet. In addition, any encounter with these resources would be subject to established guidelines

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<sup>13</sup>San Francisco Planning Department, MEA Preliminary Archeological Review: Checklist; 3155 Scott Street, June 21, 2010. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.

for their identification and protection. Therefore, the project would have **no impact** on paleontological resources or geological features.

**Impact CP-4: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would have no cumulative impacts on cultural resources. (No Impact)**

As discussed above, the proposed project would not impact cultural, historical, or paleontological resources, and so the proposed project would not contribute to cumulative cultural impacts. In addition, there do not appear to be any historical or cultural resources in the vicinity that could be impacted by the proposed project. Cumulative projects in the vicinity include the proposed developments at 2353 Lombard Street and 2774-2776 Filbert Street. Both of these projects include demolition and construction, which could impact cultural or paleontological resources. However, the proposed project would not contribute to any impact from these activities, and any projects in the vicinity would be subject to guidelines for the protection of cultural and paleontological resources. Therefore, the project would have **no impact** on cultural resources, either individually or cumulatively.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>5. TRANSPORTATION AND CIRCULATION— Would the project:</b>					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Under CEQA criteria, a project would have significant impacts on transportation and circulation if it were to conflict with any applicable circulation performance policy or an applicable congestion management program, change air traffic patterns, substantially increase hazards due to a design feature, affect emergency access, or conflict with adopted plans or programs of public transit or other means of transportation.

The project site is not within an Airport Influence Area, as defined by AB 2776. In addition, the site is not within two miles of a public airport or in the vicinity of a private airstrip. The proposed project would not interfere with air traffic patterns. Therefore, criterion E.5c is not applicable to the proposed project. Further, the proposed project does not include any features that would alter the street pattern nor increase transportation hazards (e.g., create a new sharp curve or dangerous intersection). Therefore, criterion E.5d is not applicable to the proposed project.

The proposed project would convert the building's use from a 29-room hotel into 25 units of group housing, with approximately 1,856 square feet of supportive services and community space. Pedestrian access to the building is at the intersection of Lombard and Scott Streets, with four secondary entrances along Scott Street. The proposed project would reconfigure the windows and bays and would remove all but one of the entrances along Scott Street. Employees and residents would access the building through an entrance along Scott Street, and the former entrance on Lombard and Scott Streets would be closed. Two white-curb passenger loading spaces along Scott Street would remain. There is no vehicle access onto the site.

There would be a total of eight employees at the project site: a full-time live-in manager, a property manager, four residential support staff, one janitor, and one maintenance person. The residential support staff would be on-site during staggered shifts for counseling, job training, and related support services throughout the day and early evening. The janitor and maintenance person would work part time and would not always commute to the project site daily. In addition, up to two visitors are

expected to commute to the site by car daily.<sup>14</sup> To account for maximum project effects on the transportation network, this analysis assumes that the seven nonresident employees and two visitors would commute to the project site daily and during peak commute hours.

Regional access to the project site is via Lombard Street (US Highway 101), which is the northerly site frontage; the San Francisco-Oakland Bay Bridge Interstate-80 (I-80) is approximately 2.6 miles southeast of the site, and I-280 is approximately 4.5 miles to the southeast. The primary arterial roadways serving the site are Divisadero Street, one block west, Fillmore Street, approximately 0.28 mile east, Webster Street, approximately 0.37 mile east, and Marina Boulevard, approximately 0.46 mile north.

The local roadway network in the project vicinity is primarily composed of Scott Street, which is a two-way local street with two travel lanes. Traffic volumes on Scott Street are low to moderate. Lombard Street, which serves as US Highway 101 in the vicinity of the project site, is a two-way major arterial with six travel lanes.<sup>15</sup> Traffic volumes along Lombard Street in the vicinity of the project site consist of 34,500 daily vehicle trips, primarily resulting from its direct access to the Golden Gate Bridge and destinations in Marin County and beyond.<sup>16</sup>

The project site is served by many local public transportation options, including bus service via Muni Routes 22 - Fillmore, 28 - 19<sup>th</sup> Avenue, 30 - Stockton, 41 - Union, 43 - Masonic, 45 - Union-Stockton, and 76 - Marin Headlands, all within three blocks of the site.

**Impact TR-1: The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, nor would the proposed project conflict with any applicable congestion management program, including but not limited to level of service standards and travel demand measures. (Less than Significant)**

Policy 10.4 of the Transportation Element of the San Francisco General Plan states that the City will “Consider the transportation system performance measurements in all decisions for projects that affect the transportation system”; to determine whether the proposed project would conflict with a

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<sup>14</sup>Hirschkop, Hershey. 2010. Personal Communication..

<sup>15</sup>San Francisco General Plan, Transportation Element, Map 6; Vehicular Street Map. Internet website: [http://www.sf-planning.org/ftp/general\\_plan/images/I4.transportation/tra\\_map6.pdf](http://www.sf-planning.org/ftp/general_plan/images/I4.transportation/tra_map6.pdf). Accessed December 28, 2010.

<sup>16</sup>California Department of Transportation. 2009 Traffic Volumes on Highway 101. Internet website: <http://www.dot.ca.gov/hq/traffops/saferestr/trafddata/2009all/Route101i.htm>. Accessed February 27, 2011.

transportation- or circulation-related plan, ordinance, or policy, this section analyzes the proposed project's effects on intersection operations, transit demand, pedestrian and bicycle circulation, and parking and freight loading. Also analyzed are the project's construction impacts.

### *Trip Generation*

As set forth in the Planning Department's October 2002 *Transportation Impact Analysis Guidelines for Environmental Review* (the *SF Guidelines*), traffic conditions for the weekday PM peak-hour period (4:00 to 6:00 PM) determine thresholds of significance and the level of environmental impact. Weekday PM peak-hour conditions typically represent the maximum use of the local transportation network.

Using the land use categories in the *SF Guidelines*, hotel uses typically generate 7 trips per day per room, while studio and one-bedroom residential units typically generate 7.5 trips per day per unit, with 17.3 percent occurring during the PM peak hour. The 29-room hotel at the project site generated about 203 person trips per day, about 117 daily vehicle trips, and approximately 12 vehicle trips during the PM peak hour. This is based on the transportation mode split of the census tract in which the project site is located.<sup>17</sup>

Table 1 presents trip generation rates for the residents and employees of the proposed project. On an average day, the project would be occupied by 24 transitional-age youth and eight employees, one of which would be a resident manager. For the purpose of analyzing travel patterns, the proposed project would include 25 residents and seven employees. Further, up to two visitors daily and during peak commute hours are expected to come to the site. Based on the trip generation rate for residential use in the *SF Guidelines*, the residents at the project site would generate an estimated average of 188 daily person-trips, including 32 daily person-trips during the PM peak hour. These PM peak-hour person-trips would be distributed among various modes of transportation, including 20 vehicle person trips, nine public transit trips, two walking trips, and one by other means that could include a bicycle or motorcycle. The trip generation estimate, although consistent with the *SF Guidelines*, may be conservative, because the project would be occupied by transitional-age youth, and auto ownership may be lower for the project residents than for other neighborhood residents, thus reducing vehicle trip generation compared to the *SF Guidelines* rates, plus no parking. However, it would be speculative

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<sup>17</sup>The project site is located in Census Tract 128, and the average vehicle occupancy is 1.09 for car, truck, and van trips.



**Table 1 – Trip Generation of the Proposed Project**

	Daily	PM Peak Period
<b>25 Residents</b>		
Person trips	188	32
Auto	118	20
Transit	53	9
Walking	14	2
Other (e.g., bicycle, motorcycle)	3	1
<b>7 Employees</b>		
Person trips	28	7
Auto	28	7
<b>2 Visitors</b>		
Person Trips	4	2
Auto	4	2
<b>Total person trips</b>	<b>220</b>	<b>41</b>

to incorporate these assumptions into the calculations, and so the *SF Guidelines* rates are considered satisfactory.

To conservatively estimate the typical daily travel of the seven employees who commute to the site (a property manager, four residential support staff, one janitor, and one maintenance person), the assumption is four potential auto trips per employee (two daily travel trips to and from work and two trips to and from lunch). During the PM peak hour, there would be one vehicle trip per employee. The seven employees who commute would generate seven PM peak-hour vehicle trips daily. Further, it is estimated that up to two visitors daily would come to the project site during peak commute hours. The visitors would generate four person trips per day with two trips during the PM peak hour. The proposed project would therefore generate a total of 220 person trips per day, with a total of 150 vehicle trips per day, 29 of which would be during the PM peak hour. The proposed project would result in a net increase of 17 vehicle trips during the PM peak hour from the previous hotel use, as shown in Table 2.

**Table 2 – Vehicular Trip Comparison - Previous Use and Proposed Project**

	Daily	PM Peak Period
<b>Proposed Project</b>		
Vehicle trips (residents, employees, and visitors)	150	29
<b>Edward II Inn and Suites</b>		
Vehicle Trips (Guests and Employees)	117	12

This would not be a potentially significant traffic impact, since the increase in trips would not be sufficient to degrade the existing Level of Service (LOS) in the nearby intersections to unacceptable levels or to result in a substantial increase in traffic volume in the vicinity. The project would not contribute significantly to an LOS decline at adjacent roadway intersections, based on LOS standards in the *SF Guidelines*. The change in traffic in the project area as a result of the proposed project would be undetectable to most drivers, particularly given the relatively high volume of traffic on Lombard Street during the PM peak-hour period. Therefore, the proposed project would result in a **less than significant** impact on vehicular traffic, both individually and cumulatively.

### *Parking*

San Francisco does not consider parking as part of the permanent physical environment and so does not consider changes in parking conditions to be environmental impacts, as defined by CEQA. However, the San Francisco Planning Department acknowledges that parking conditions may be of interest to the public and decision makers, so a parking analysis and discussion are included here for informational purposes.

Parking conditions are not static, as parking supply and demand vary from day to day, from day to night, from month to month, and so forth. Hence, the availability of parking spaces is not a permanent physical condition but changes over time as people change their modes and patterns of travel. Parking deficits are considered to be social effects, rather than impacts on the physical environment, as defined by CEQA.

Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. However, environmental documents should address the secondary physical impacts that could be triggered by a social impact.<sup>18</sup> The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion.

There is currently no dedicated parking for the site, so on-street parking in the vicinity would continue to be accessed with the proposed project. The prior hotel contained 29 guest rooms; unlike most retail and commercial uses, hotel guest parking and some employee parking is usually overnight, so parking

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<sup>18</sup>CEQA Guidelines, Section 15131[a]

spaces are occupied for relatively long periods, including the possibility of multiple days/evenings. According to the *SF Guidelines*, there would be a demand for 23 parking spaces by guests, with up to 3 by hotel staff, while the proposed project would result in demand for 11 spaces for residents and up to 9 spaces for staff and visitors.<sup>19</sup> This would result in a net decrease in demand of 6 parking spaces under the proposed project. In addition, according to the experience of San Francisco transportation planners, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., public transit, taxis, bicycles, and foot travel) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, to shift to other modes of travel, or to change their overall travel habits. Any such resulting shifts to transit service in particular would be in keeping with the City's Transit First policy. Transit and bicycling options are available in the project area, as discussed under Impact TR-3.

The transportation analysis accounts for potential secondary effects, such as drivers circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts that may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise, and pedestrian safety analyses, reasonably address potential secondary effects.

There would be temporary parking demand from construction workers and impacts on local intersections from construction worker traffic, in proportion to the number of construction workers who would drive. Up to six construction workers are estimated to be at the project site each day during construction. In the long term, the seven employees and visitors to the project site are estimated to need up to nine parking spaces per day. The construction workers, employees, and visitors would park on the street in the project vicinity. Although they may have to circulate on nearby streets to find available parking, the anticipated parking deficit would not substantially change the capacity of the street system or alter the parking conditions in the area.

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<sup>19</sup>*SF Guidelines, Appendix G: Parking Analysis Methodology.* This assumes 0.8 parking spaces per guest room plus 2 spaces for employees for the previous hotel use, and 0.45 spaces per unit utilizing the affordable rental one-bedroom or studio ratio, plus 4 parking spaces for employees and visitors for the proposed project. Employee parking accounted for travel mode split for each use.



### *Loading*

Planning Code Section 152 does not require an off-street loading space for under 100,000 square feet of residential use; therefore, off-street loading space would not be required for the proposed project. However, there are two white-curb passenger loading spaces adjacent the project site along Scott Street. The number of delivery and service vehicles generated by the project would be, on average, less than one truck trip per day.<sup>20</sup> The project could involve other delivery and service trips, including vanpool trips for resident activities; however, the volume of these trips, given the project size, would not result in potentially significant impacts from loading, and loading impacts are considered to be **less than significant**.

### *Construction Impacts*

Construction of the proposed project would not involve heavy earthmovers or grading equipment, since only minor exterior alterations and some interior alterations would be made. Construction vehicles could include a boom lift for exterior alteration work and possibly a crane for installing the elevator. At any time during the construction period there would be up to five construction trucks parked near the project site, on Lombard Street and on the surrounding streets. During the project's approximately 10-month construction period anticipated to begin in 2012, temporary and intermittent traffic and transit impacts would result from truck movements to and from the site. Truck movements during periods of peak traffic flow would have greater potential to create conflicts than during non-peak hours because of the greater numbers of vehicles on the streets during the peak hour. The project sponsor and construction contractors would meet with the City's Transportation Advisory Staff Committee to determine feasible measures to reduce traffic congestion, including effects on the transit system and pedestrian circulation impacts during construction of the proposed project. The Transportation Advisory Staff Committee consists of representatives from the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, and the SFMTA. Thus, impacts related to applicable transportation circulation system plan or policy would be **less than significant**.

### **Impact TR-2: The proposed project would not result in inadequate emergency access. (No Impact)**

The proposed project would not significantly alter the site or the approach to the site. The building entry would be relocated along Scott Street. The project would not change emergency access, as the

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<sup>20</sup>San Francisco Planning Department, Transportation Impact Analysis Guidelines for Environmental Review, October 2002, Appendix H, Freight Delivery and Service Methodology. Average daily rate calculated based on 8,125 square feet of residential use at a rate of 0.03 truck trip per 1,000 square feet.

site is readily accessible from all major streets. Further, accessibility improvements would be made as determined by the City to ensure compliance with the Americans with Disabilities Act (ADA).

Therefore, the project would have **no impact** on emergency access.

**Impact TR-3: The proposed project would not conflict with adopted policies, plans or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such features. (Less than Significant)**

#### *Transit Conditions*

Muni provides transit service in San Francisco, including both diesel and electric trolley buses, light rail (Muni Metro), cable car, and electric streetcar lines. Muni operates four bus lines within a two-block radius of the project site: the 28 - 19<sup>th</sup> Avenue, 30 - Stockton, 43 - Masonic , and 76 - Marin Headlands. In addition, there are three additional lines within a three-block radius: the 22 - Fillmore, 41 - Union, and 45 - Union-Stockton. Based on the *SF Guidelines*, the proposed project would generate about nine PM peak-hour transit trips; this represents an increase of three trips over the previous hotel use and would have a less than significant impact on transit. Also, these three trips would be distributed among the various lines, and transit capacity would not significantly decrease as a result of project-generated transit trips. One of the eight priority policies added to Planning Code Section 101.1 by Proposition M, the Accountable Planning Initiative, is to discourage commuter automobiles. In addition, the City's Transit First policy, established in the City Charter, Section 16.102, provides that "parking policies for areas well-served by public transit shall be designed to encourage travel by public transportation and alternative transportation." The project site is in the vicinity of several transit routes, and the proposed project contains no on-site parking to encourage automobile use; thus the proposed project would not conflict with transit-related policies established by Proposition M or the City's Transit First policies and would result in a **less than significant** impact on transit.

#### *Bicycle Conditions*

Bicycle routes in the project vicinity are Routes #4, #6, and #45, with the closest being Route #6, which runs along Greenwich Street, within one block south of the project site. Bike Route #4 runs along Francisco Street, two blocks north of the project site. Bike Route #45 runs along Steiner Street, two

blocks east of the project site. These routes connect with other routes in the city, providing bicycle access to employment centers and recreation and cultural facilities.<sup>21</sup>

Planning Code Section 155.5, Bicycle Parking Required for Residential Uses, requires that group housing in all districts provide one Class I bicycle space for every three bedrooms. Accordingly, the project would be required to provide 9 Class I spaces. The project sponsor intends to provide the required number of bicycle parking spaces in the building's basement, as shown in Figure 9 - Proposed Basement Plan.

The proposed project is not expected to have an adverse impact on bicycle conditions in the project area. The proposed project would generate up to three bicycle trips per day. On June 26, 2009, the SFMTA approved the San Francisco Bicycle Plan. The plan includes updated goals and objectives that encourage bicycle use in the city, describes a safe and distinct bike road network, and identifies improvements to achieve the established goals and objectives. The proposed project would not result in significant impacts and would not conflict with the bicycle plan. Therefore, the proposed project would have a **less than significant impact** on bicycle conditions.

#### *Pedestrian Conditions*

According to the trip generation criteria in the *SF Guidelines*, the project would generate approximately 14 pedestrian trips per day. Sidewalks are provided on all surrounding streets. The proposed project would not cause a substantial amount of pedestrian and vehicle conflict since sidewalks next to the project site have excess capacity, as evidenced by the lack of pedestrian crowding and queuing. Sidewalk widths are sufficient to allow for the free flow of pedestrian traffic. Therefore, the proposed project would have a **less than significant impact** on local sidewalks and would not result in safety concerns.

**Impact TR-4: The proposed project in combination with past, present, and reasonably foreseeable future projects, would have less than significant cumulative transportation impacts. (Less than Significant)**

The proposed project would not cause a substantial increase in traffic, in relation to the existing traffic load and capacity of the street system. As reflected in the trip generation explained Impact TR-1, the

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<sup>21</sup>San Francisco Municipal Transportation Agency, San Francisco Bicycle Plan, June 26, 2009; San Francisco Planning Department, San Francisco Bicycle Plan Final Environmental Impact Report, certified June 25, 2009.



project would result in a less than significant increase in traffic and a less than significant contribution to a LOS decline at adjacent intersections. The proposed project does not include any hazardous design features or incompatible uses and would not result in inadequate emergency access to the site itself, or any surrounding sites. The proposed project would not substantially increase transit demand that could not be accommodated by existing and proposed transit capacity and alternative travel modes. With the addition of 17 PM peak-hour vehicle trips, the proposed project would have a less than significant cumulative impact because it would add a negligible number of PM peak-hour vehicle trips to local vehicle traffic.

Project construction, in combination with other major construction in the project area, would not significantly impact local or regional roads. The largest current construction project in the vicinity is the reconstruction of the Doyle Drive approach to the Golden Gate Bridge (Presidio Parkway project). Construction of this project began in 2009 and is expected to last into 2014. This project involves several temporary road closures, including Lincoln Boulevard and Halleck Street. These closures could redirect both construction and general traffic in the project vicinity. However, construction of the proposed project would not significantly contribute to the potential cumulative traffic impacts, because project construction would primarily entail interior reconfiguration and minor exterior alteration, so no heavy earthmoving or grading equipment or vehicles are anticipated that could impede traffic patterns during project construction.

Several minor development projects have recently been proposed in the project vicinity. These include a proposal at 2353 Lombard Street, approximately half a block east of the project site, that would demolish a two-story restaurant and construct a three-story mixed-use building, featuring ground floor commercial and three floors of residences. In addition, a proposal is under City planning review at 2775-2776 Filbert Street, approximately three and one-half blocks southwest of the project site, that would add a fourth floor to a three-floor, two-unit residential building. These projects would add vehicle, transit, and bike and pedestrian trips to the local street network, in addition to the proposed project; however, their scale, combined with the scale of the proposed project, would not increase local trips to a level resulting in a potentially significant impact. Therefore, cumulative impacts on traffic from both construction and operation of the project would be **less than significant**.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>6. NOISE—Would the project:</b>					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local <i>General Plan</i> or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Under CEQA criteria, a project would have significant impacts on noise if it were to expose persons or generate noise levels or ground-borne vibrations in excess of established standards, increase permanent or temporary ambient noise levels, expose people near airports or private airstrips to excessive noise levels, or be substantially affected by existing noise levels. The project site is not in an airport land use plan area or in the vicinity of a private airstrip. Therefore, criteria E.6e and E.6f are not applicable to the proposed project.

**Impact NO-1: The proposed project would not result in the exposure of persons to or generation of noise levels in excess of established standards, nor would the proposed project result in a substantial permanent increase in ambient noise levels or otherwise be substantially affected by existing noise. (Less than Significant)**

*Exposure to Noise during Operation*

The Environmental Protection Element of the San Francisco General Plan contains Land Use Compatibility Guidelines for Community Noise.<sup>22</sup> These guidelines, which are similar to state guidelines set forth by the Governor's Office of Planning and Research, indicate maximum acceptable noise levels for various land uses. For residential uses, the maximum satisfactory noise level without incorporating noise insulation into a project is 60 dBA (Ldn),<sup>23</sup> while the guidelines indicate that residential development should be discouraged at noise levels above 70 dBA (Ldn).<sup>24</sup> Where noise levels exceed 65 dBA, a detailed analysis of noise reduction requirements is typically necessary before final review and approval, and new residences must include noise insulation features in their design. In addition, Title 24 of the California Code of Regulations establishes uniform noise insulation standards for residential projects.

To analyze the noise environment at the project site, an environmental noise consulting firm, Charles M. Salter Associates, conducted two continuous two-day measurements and five 15-minute short-term measurements.<sup>25</sup> Measurements were taken from the building at elevations between 5 and 25 feet above grade and distances ranging between 40 and 110 feet of the Lombard Street centerline and 30 and 90 feet of the Scott Street centerline. Salter Associates found that the dominant noise sources at the site are from vehicle traffic along Lombard Street, with noise measurements ranging from 67 dB to as high as 80 dB. Based on the measured noise levels, the project site is within the San Francisco Land Use Compatibility Guidelines for Community Land Use Category C, in which "new construction or

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<sup>22</sup>City and County of San Francisco, Planning Department, San Francisco General Plan, Environmental Protection Element, Policy 11.1.

<sup>23</sup>Sound pressure is measured in decibels (dB), with zero dB corresponding roughly to the threshold of human hearing, and 120 dB to 140 dB corresponding to the threshold of pain. Because sound pressure can vary by over one trillion times within the range of human hearing, a logarithmic loudness scale is used to keep sound intensity numbers at a convenient and manageable level. Owing to the variation in sensitivity of the human ear to various frequencies, sound is "weighted" to emphasize frequencies to which the ear is more sensitive, in a method known as A-weighting, and is expressed in units of A-weighted decibels (dBA).

<sup>24</sup>The guidelines are based on maintaining an interior noise level of interior noise standard of 45 dBA, Ldn, as required by the California Noise Insulation Standards in Title 24, Part 2 of the California Code of Regulations.

<sup>25</sup>Charles M. Salter Associates, Inc., Edward II – Environmental Noise Study, San Francisco, California, June 15, 2010. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.



development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made, and needed noise insulation features included in the design.” Salter Associates assessed the interior noise environment and provided recommendations to achieve an indoor noise level of 45 dB.

As part of its design, the proposed project would comply with the California Building Code interior noise requirements of Ldn 45 db by installing such building materials as sound-rated windows, gypsum board, and batt and blown-in insulation.<sup>26</sup> The Department of Building Inspection would review project plans for compliance with Title 24 noise standards. Compliance with Title 24 standards and with the City’s General Plan would ensure that effects from exposure to ambient noise would result in **less than significant** impacts.

#### *Generation of Traffic Noise during Operation*

The project would not increase traffic volumes to a degree that would cause a noticeable increase in the ambient noise level in the project vicinity, nor would it contribute to any potential cumulative traffic noise effects.<sup>27</sup> Therefore, impacts of the proposed project related to the generation of traffic noise during operation would be **less than significant**.

#### *Generation of Building Noise during Operation*

The project includes mechanical equipment that could produce operational noise, such as that from heating and ventilation systems. These operations would be subject to Section 2909 of the City’s Noise Ordinance (Article 29 of the San Francisco Police Code). As amended in November 2008, this section establishes a noise limit from mechanical sources, such as building equipment, specified as a certain noise level in excess of the ambient noise level at the property line: for noise generated by residential uses, the limit is 5 dBA in excess of ambient level.<sup>28</sup> In addition, the noise ordinance provides for a separate fixed-source noise limit for residential interiors of 45 dBA at night and 55 dBA during the day and evening hours (until 10:00 PM). The proposed project would comply with Article 29, Section 2909, by including acoustical construction improvements to achieve an interior day-night equivalent sound level of 45 dB. Compliance with Article 29, Section 2909, would minimize noise from building

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<sup>26</sup>Charles M. Salter and Associates, Inc., Edward II-Environmental Noise Study, San Francisco, CA, June 15, 2010.

<sup>27</sup>Federal Highway Administration. US Department of Transportation. 2011. Highway Traffic Noise. Internet Web site: [www.fhwa.dot.gov/environment/noise/regulations\\_and\\_guidance/analysis\\_and\\_abatement\\_guidance/polguide01.cfm](http://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/polguide01.cfm). Accessed on January 13, 2011.

<sup>28</sup>Entertainment venues are also subject to a separate criterion for low-frequency (bass) noise.

operations. Therefore, noise effects related to building operation would be **less than significant**, nor would the building contribute a considerable increment to any cumulative noise impacts from mechanical equipment.

#### *Generation of Residents' Noise during Operation*

The subject property has operated as a hotel for nearly a century. This is a 24-hour use, seven days a week, and the hotel was most likely occupied by over 50 people at full occupancy. The proposed project would change the current use of the building from a 29-room tourist hotel to 25 units of group housing, with approximately 1,856 square feet of supportive services and community space. The project would include "quiet hours" between 10:00 PM to 7:00 AM, ensuring that noise from residents would not become a nuisance to neighbors. In addition, the on-site facility manager would be responsible for ensuring that the facility complies with all applicable provisions of Section 2909 of the Noise Ordinance, which sets noise limits for residential property uses.

**Impact NO-2: During construction, the proposed project would result in a temporary or periodic increase in ambient noise levels and vibration in the project vicinity above levels existing without the project, but any construction-related increase in noise levels and vibration would be considered a less than significant impact. (Less than Significant)**

Conversion of the former hotel into the transitional-age youth housing and the associated alterations would temporarily increase noise in the vicinity. Construction equipment would generate noise and possibly vibrations that could be considered an annoyance by occupants of nearby properties. No heavy external excavation equipment, such as pile drivers, would be used during construction. Construction noise would fluctuate depending on the construction phase, equipment type and duration of use, and distance between noise source and listener. Further, construction noise would be intermittent and limited to the period of construction.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Section 2908 of the ordinance prohibits construction between 8:00 PM and 7:00 AM, if noise would exceed the ambient noise level by 5 dBA at the proposed project property line, unless a special permit is authorized by the Director of the DPW or DBI. Compliance with the noise ordinance would reduce most potential construction noise

impacts to a **less than significant** level, including noise effects on residential uses in the immediate vicinity, which are considered sensitive receptors.

**Impact NO-3: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in less than significant cumulative noise impacts. (Less than Significant)**

Local traffic noise would increase in conjunction with foreseeable residential and commercial growth in the project vicinity, though this increase would be far less than the doubling of traffic noise that would result in an audible change. However, because neither the proposed project nor the other cumulative impacts in the vicinity are anticipated to result in a doubling of traffic volumes along nearby streets, the project would not contribute considerably to any cumulative traffic-related increases in ambient noise. Moreover, the proposed project's mechanical equipment and occupants would be required to comply with the Noise Ordinance and would therefore not be expected to contribute to any cumulative increases in the ambient noise as a result of the building equipment or occupants. Therefore, the proposed project would not result in cumulatively considerable noise impacts, and cumulative noise impacts are considered **less than significant**.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>7. AIR QUALITY--Would the project:</b>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project is in the City and County of San Francisco, within the San Francisco Bay Area Air Basin (SFBAAB). In addition to San Francisco, the SFBAAB encompasses Alameda, Contra Costa,



Marin, Napa, San Mateo, and Santa Clara Counties, the southern half of Sonoma County, and the southwestern portion of Solano County.

The federal Environmental Protection Agency (EPA) is responsible for establishing and enforcing National Ambient Air Quality Standards and requires states with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP), which provides the measures adopted to comply with the federal EPA standards. At the state level, the California Air Resources Board (CARB) establishes ambient air quality standards and policies for emissions controls and standards and is responsible for preparing the SIP.

At the regional level, the Bay Area Air Quality Management District (BAAQMD) is responsible for maintaining air quality standards in the SFBAAB, as well as developing and maintaining standards for attaining air quality levels, in compliance with federal and state laws and regulations, including the federal Clean Air Act.<sup>29</sup> The BAAQMD has implemented ozone attainment plans and clean air plans to establish emission control measures to reduce ozone, particulate matter (PM), toxics and greenhouse gas emissions and to set targeted dates for compliance with these measures. The most recent version of the clean air plan was adopted on September 15, 2010.

To establish compliance with all CEQA provisions and guidelines, BAAQMD has adopted the CEQA Air Quality Guidelines, most recently on June 17, 2010.<sup>30</sup> These guidelines establish thresholds of significance and provide procedures for evaluating criteria air pollutants, greenhouse gas (GHG) emissions, and health risks from new sources of emissions consistent with CEQA requirements.

The San Francisco General Plan includes an air quality element establishing policies to reduce the level of air pollutants and to improve the public health and quality of life of the people of San Francisco.

These policies are as follows:

- Adhere to state and federal ambient air quality standards and programs and reduce mobile sources of air pollution through implementation of the transportation element of the General Plan;

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<sup>29</sup> State and Federal air quality standards for the Bay Area's attainment status is available at the BAAQMD website at [www.baaqmd.gov](http://www.baaqmd.gov), accessed March 23, 2011.

<sup>30</sup> Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, June 2010 (BAAQMD 2010 Guidelines). This document is available online at [www.baaqmd.gov](http://www.baaqmd.gov), accessed April 4, 2011.

- Decrease the air quality impacts of development by coordinating land use and transportation decisions;
- Improve air quality by increasing public awareness of the negative health effects of pollutants generated by stationary and mobile sources;
- Minimize particulate matter emissions from road and construction sites; and
- Link the positive effects of energy conservation and waste management to maintain reductions.

In addition, the San Francisco Department of Public Health (DPH) has issued guidance for the identification and assessment of potential air quality hazards and methods for assessing the associated health risks.<sup>31</sup> Consistent with CARB guidance, the DPH has identified a potential public health hazard for sensitive land uses, when such uses are within a 150-meter (approximately 500-foot) radius of any boundary of a project site that experiences 100,000 vehicles per day. To this end, San Francisco added Article 38 of the San Francisco Health Code, approved November 25, 2008, which requires that, for new residential projects of 10 or more units located near high-traffic roadways, as mapped by DPH, an air quality assessment be prepared to determine whether residents would be exposed to potentially unhealthful levels of PM<sub>2.5</sub>. Through air quality modeling, an assessment is conducted to determine if the annual average concentration of PM<sub>2.5</sub> from the roadway sources would exceed a concentration of 0.2 microgram per cubic meter (annual average).<sup>32</sup> If this standard were exceeded, the project sponsor must install a filtered air supply system, with high-efficiency filters, designed to remove at least 80 percent of ambient PM<sub>2.5</sub> from habitable areas of residential units.

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<sup>31</sup>San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 6, 2008, [http://dphwww.sfdph.org/phes/publications/Mitigating\\_Roadway\\_AQLU\\_Conflicts.pdf](http://dphwww.sfdph.org/phes/publications/Mitigating_Roadway_AQLU_Conflicts.pdf), accessed October 28, 2009.

<sup>32</sup>According to DPH, this threshold, or action level, of 0.2 micrograms per cubic meter represents about 8 – 10 percent of the range of ambient PM<sub>2.5</sub> concentrations in San Francisco based on monitoring data, and is based on epidemiological research that indicates that such a concentration can result in an approximately 0.28 percent increase in non-injury mortality, or an increased mortality at a rate of approximately 20 "excess deaths" per year per one million population in San Francisco. "Excess deaths" (also referred to as premature mortality) refer to deaths that occur sooner than otherwise expected, absent the specific condition under evaluation; in this case, exposure to PM<sub>2.5</sub>. (San Francisco Department of Public Health, Occupational and Environmental Health Section, Program on Health, Equity, and Sustainability, "Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review, May 6, 2008. Twenty excess deaths per million based on San Francisco's non-injury, non-homicide, non-suicide mortality rate of approximately 714 per 100,000. Although San Francisco's population is less than one million, the presentation of excess deaths is commonly given as a rate per million population.)

**Impact AQ-1: The project would not conflict with or obstruct implementation of an applicable air quality plan. (Less than Significant)**

The current air quality plan for the SFBAAB is the 2010 Clean Air Plan. This plan emphasizes travel activities and land use planning policies and measures to assist local jurisdictions in establishing goals for attaining compliance with the plan's target threshold dates. In addition, the plan uses the numbers from the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) for population and demographic data for assuming regional emission forecasts. The project would introduce a new land use that would not induce additional traffic trips in numbers that would constitute a significant impact on the local roadway network, local transit lines, or local bicycle and pedestrian networks. In addition, the density of the project would not conflict with local area plans or induce growth beyond ABAG projections. Therefore, the proposed project would have a **less than significant** impact on the implementation of applicable air quality plans.

**Impact AQ-2: Construction of the proposed project would not violate or contribute to the violation of an air quality standard. (Less than Significant)**

Construction of the proposed project would involve both interior and exterior renovation and remodeling and minor excavation for the installation of an elevator. These construction activities would include use of emissions-producing equipment and fugitive dust and potentially volatile organic compounds by removing building materials and installing materials for the proposed use. To determine potential construction-related emissions against thresholds of significance established by the BAAQMD, an analysis was conducted.<sup>33</sup> This analysis calculates criteria pollutant emissions, diesel particulate emissions, and GHG emissions from construction or demolition activities and equipment.

Criteria pollutant emission estimates are provided for reactive organic compounds, nitrogen oxides, carbon monoxide, sulfur oxides, inhalable particulate matter (PM<sub>10</sub>), and fine particulate matter (PM<sub>2.5</sub>). Particulate matter emissions from diesel engines contain known and suspected carcinogens and consequently have been designated as a toxic air contaminant by CARB. Exhaust emissions of PM<sub>10</sub> from construction and demolition equipment provide the estimate of diesel particulate matter emissions. GHG emission estimates are provided for carbon dioxide, methane, and nitrous oxide. The

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<sup>33</sup> Tetra Tech, Inc. Construction Emissions Analysis for the 3155 Scott Street Project, May 6, 2011. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.



overall global warming potential of GHG emissions also is calculated in terms of carbon dioxide equivalents.

The construction emissions analysis assumed 109 truckloads of equipment, building materials, appliances, furnishings, and debris removal during an estimated 207-day construction period. Construction workers would add an additional six personal vehicles each day but would not be parking in the construction work zone. Construction zone emissions from truck traffic to and from the site assumed 5 minutes of engine operations in the construction zone during each one-way truck trip. The Scott Street frontage of the building was assumed to be the primary equipment activity zone during active construction hours.

As Table 3 indicates, construction site emissions would be well below the impact significance thresholds specified by the BAAQMD CEQA guidelines, as annual total construction site emissions would be less than 0.04 ton (80 pounds) for any individual pollutant.

**Table 3 – Summary of Daily Construction Emissions, Maximum Emissions**

Emissions Component	Construction Site Emissions, Pounds Per Day						
	ROG	NOx	CO	SOx	PM10	PM2.5	DPM
Engine exhaust	0.49	1.66	1.99	0.08	0.08	0.14	0.14
Fugitive dust	0.00	0.00	0.00	0.00	0.19	0.03	0.00
Fugitive ROG	3.98	0.00	0.00	0.00	0.01	0.00	0.00
TOTAL	4.47	1.66	1.99	0.08	0.28	0.17	0.14
BAAQMD threshold	54	54	NA	NA	82	54	NA
Above threshold?	No	No	No	No	No	No	No

ROG=reactive organic gases  
 NOx = nitrogen oxides  
 CO = carbon monoxide  
 SOx = sulfur dioxides  
 PM10 = inhalable particulate matter  
 PM2.5 = fine particulate matter  
 DPM = diesel particulate matter  
 Source: Tetra Tech, 2011

#### *Health Risk Evaluation Procedures*

Dispersion modeling analyses were conducted to evaluate health risks associated with construction site emissions. The CAL3QHCR dispersion model (EPA 1995) was used as an area source model for these analyses.

For analysis purposes, all construction site emissions were assumed to occur in a 15-foot-wide zone along the Scott Street frontage of the building. Annual meteorological data for 2004 and 2005 from the

Mission Bay meteorological station were used for the dispersion modeling analyses. The modeling analyses estimated maximum 1-hour, maximum 24-hour, and annual average pollutant concentrations at 21 off-site receptor locations in the project neighborhood. Universal transverse mercator coordinates for the modeled area source link and the various receptor locations were determined in the project vicinity. Construction emissions were modeled as occurring on Mondays through Fridays for 10 hours per day (7 AM to 5 PM). Modeled pollutants included PM<sub>2.5</sub>, diesel particulate matter (DPM), and total organic gases (TOG). Modeled pollutant concentrations were evaluated for cancer risk and health hazard index values, and are summarized in Table 4, as follows:

**Table 4 – Summary of Dispersion Modeling Results for Construction Site Emissions**

	Dispersion Modeling Outdoor PM <sub>2.5</sub>	Incremental Cancer Risks from DPM and TOG	Chronic Hazard Index from DPM and TOG (annual)	Acute Hazard Index from DPM and TOG (1hour)
Maximum value	0.14	2.7462	0.0177	0.0227
BAAQMD threshold	.30	10	1.0	1.0
Above threshold?	No	No	No	No

DPM = diesel particulate matter  
PM<sub>2.5</sub> = fine particulate matter  
TOG = total organic gases  
Source: Tetra Tech, 2011

This analysis indicates that construction at the proposed project site would not create PM<sub>2.5</sub>, DPM, and TOG concentrations above the BAAQMD impact significance threshold, even at immediately adjacent properties.

In addition, the San Francisco Building and Health Code contains a construction dust control ordinance<sup>34</sup> that addresses dust emissions related to construction site preparation, demolition, and construction. This ordinance requires that all site preparation, demolition, or other construction that has the potential to create dust or expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures as prescribed. Since site preparation and construction activities of the proposed project would be under this threshold, the provisions of this ordinance would not apply.

Construction of the project would have a **less than significant** impact on air quality. This is because construction would not violate or exceed any threshold of significance, in accordance with BAAQMD

<sup>34</sup>Ordinance Number 176-08, effective June 30, 2008

construction emissions standards. Moreover, guidelines and BMPs are in place from existing ordinances that may apply to construction.

**Impact AQ-3: The proposed project's emissions would expose sensitive receptors to substantial pollutant concentrations (Less than Significant with Mitigation)**

The BAAQMD has adopted impact significance thresholds for traffic and stationary source health risks. These thresholds include cancer risk, non-cancer hazards, and PM<sub>2.5</sub> exposure levels. The 2010 BAAQMD CEQA Air Quality Guidelines use the same thresholds of significance as the 1999 BAAQMD CEQA Guidelines for health risk from operational sources (i.e., increased cancer risk greater than 10 per million, and for both chronic and acute non-cancer hazard index each greater than 1.0). The 2010 BAAQMD CEQA Air Quality Guidelines also established a new threshold of 0.3 µg/m<sup>3</sup> or greater annual average for operational ambient PM<sub>2.5</sub> increases, and recommend more complex modeling techniques for determining carcinogenic health risk, non-carcinogenic health hazard, and maximum annual PM<sub>2.5</sub> concentrations in areas subject to mobile source TAC emissions. The BAAQMD health risk thresholds are summarized in Table 5 below.

**Table 5 – Project Increment Health Risk Significance Criteria**

Health Risk Category	BAAQMD Threshold
Annual average PM <sub>2.5</sub> exposure	0.30 micrograms/cubic meter
Cancer risk	10 in a million
Non-cancer hazard index, chronic exposure	1.0
Non-cancer hazard index, acute exposure	1.0

PM<sub>2.5</sub> = fine particulate matter

Occupants of the proposed project would be exposed to air pollutants associated with existing and future traffic conditions in the project vicinity, as well as to local stationary emission sources, such as dry cleaners and gas stations. Emissions associated with stationary sources can include toxic air contaminants. Lombard Street carries about 34,500 vehicles per day in the vicinity of the project site,<sup>35</sup> and the proposed project is adjacent this street. Sensitive receptor locations within several hundred feet of highways carrying high traffic volumes could be exposed to elevated concentrations of PM<sub>2.5</sub>, DPM, and carcinogenic compounds in vehicle exhaust. Therefore an analysis was conducted to determine

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<sup>35</sup> Caltrans, 2010b.



whether project occupants could be exposed to any of these contaminants that would meet or exceed BAAQMF thresholds.<sup>36</sup>

This analysis determined that outdoor PM<sub>2.5</sub> concentrations would exceed the BAAQMD impact significance threshold (annual average of 0.30 microgram per cubic meter) around the northern half of the building. Outdoor PM<sub>2.5</sub> concentrations also would exceed the San Francisco Health Code Article 38 action level (annual average of 0.20 microgram per cubic meter) for the middle and northern portions of the building. Therefore, the following mitigation measure, Building Air Filtration and Ventilation Requirements, has been incorporated into the project to reduce PM<sub>2.5</sub> impacts to **less than significant**.

#### **Mitigation Measure M-AQ-1: Building Air Filtration and Ventilation Requirements**

To reduce the potential for exposure of building occupants to PM<sub>2.5</sub> and other toxic air contaminants, the project shall be designed to incorporate a mechanical ventilation system with air filtration that is capable of removing 80 percent of ambient PM<sub>2.5</sub>. This level of filtration requires filters with at least a MERV (minimum efficiency reporting value) rating of 12, in accordance with American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 52.2 (equivalent to approximately ASHRAE Standard 52.1 Dust Spot 85%). In addition, the project's air intakes shall be located on the eastern, western, or southern half of the building, as specified in the Air Quality Technical Report. This would increase the separation from traffic emissions on Lombard Street. The ventilation system shall be designed by an engineer certified by ASHRAE, who shall provide a written report documenting that the system offers the best available technology. In addition to installation of air filtration, the project sponsor shall present a plan that ensures ongoing maintenance plan for the ventilation and filtration systems.

Implementation of the **Mitigation Measure M-AQ-1** would ensure that indoor air quality levels would be well below the BAAQMD significance thresholds as well as Article 38 action levels.

#### *Local Stationary Source Analysis*

For the analysis, the BAAQMD stationary source database from the CEQA Guidelines was used to identify local stationary sources in the vicinity. Ten sources were identified from that database (two gas

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<sup>36</sup> Tetra Tech, Inc., CEQA Air Quality Technical Report: 3155 Scott Street Project, San Francisco, CA, May 2011. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.

stations, one auto body shop, and seven dry cleaners) as being within 1,500 feet of the project site. Seven of those sources (two gas stations, one auto body shop, and four dry cleaners) were within 1,000 feet of the project site. The remaining three dry cleaners were between 1,000 and 1,500 feet of the project site.<sup>37</sup> The BAAQMD *CEQA Guidelines* recommend that health hazard risks be evaluated for local stationary sources within 1,000 feet of the project site. The BAAQMD also suggests that this radius be expanded if there are other relatively large sources of hazardous air pollutant emissions beyond the 1,000 foot radius. Because one of the three dry cleaners beyond the 1,000-foot distance had a relatively large incremental cancer risk value, all sources within 1,500 feet of the project site were included to provide a conservative analysis.

BAAQMD data show that none of the local stationary sources have any PM<sub>2.5</sub> emissions. BAAQMD data also show that four of the dry cleaners and the auto body shop have no emissions of toxic air contaminants. The four dry cleaners with no hazardous emissions are using a nontoxic hydrocarbon compound in their process. One of these dry cleaners (Scott Cleaners) recently shut down a process unit that had been using perchloroethylene solvent and now has no emissions of toxic air contaminants.<sup>38</sup>

As indicated in Table 6, local stationary sources would not create excessive cancer risk or non-cancer health hazard exposure conditions at the project site.

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<sup>37</sup> Ibid.

<sup>38</sup> Lutz, Scott. 2010. Bay Area Air Quality Management District. Personal communication with Bob Sculley, Tetra Tech, November 22, 2010.

**Table 6 – Health Risk Analysis Results for Local Stationary Sources**

Stationary Source	Source Site Cancer Risk	Source Site Hazard Index		Project Site Cancer Risk	Project Site Hazard Index	
		Acute	Chronic		Acute	Chronic
Union 76	1.297538	0.000303	0.001173	0.0304122	0.0000071	0.0000275
Lombard Valero	1.297538	0.000303	0.001173	0.0044860	0.0000010	0.0000041
Walnut Cleaners	30	0.0014	0.0797	0.1733642	0.0000081	0.0004606
Norman Cleaners	11.2	0.000523	0.0299	0.0756522	0.0000035	0.0002020
Scott Cleaners	0	0	0	0.0000000	0.0000000	0.0000000
Arlene's Cleaners	18	0.000837	0.0478	0.0151918	0.0000007	0.0000403
Priority Express Cleaners	0	0	0	0.0000000	0.0000000	0.0000000
Cow Hollow French Cleaners	0	0	0	0.0000000	0.0000000	0.0000000
Clean Image	0	0	0	0.0000000	0.0000000	0.0000000
Lombard Collision Works	0	0	0	0.0000000	0.0000000	0.0000000
TOTALS	na	na	na	0.2991064	0.0000205	0.0007344
BAAQMD threshold	na	na	na	10	1.0	1.0
Above BAAQMD threshold?	na	na	na	No	No	No

#### *Combined Health Risks from Local Traffic and Stationary Sources*

Table 7 below summarizes the combined cancer risk from traffic and stationary source emissions exposure for residents of the proposed project. This analysis assumes a maximum youth residency of seven years and a maximum building manager residency of 50 years.

These analyses have shown that most BAAQMD emissions standards would be met with construction and operation of the proposed project. Where PM<sub>2.5</sub> levels are above BAAQMD thresholds, implementation of the air filtration and ventilation requirements of Mitigation Measure M-AQ-1 would ensure that the project would not exceed these thresholds. Therefore, the project would have a **less than significant** impact on exposing sensitive receptors to pollution concentrations with incorporation of this mitigation measure.



**Table 7 – Combined Cancer Risks for Project Residents Due to Local Emission Sources**

Receptor Location	Carcinogenic Component	Estimated Cancer Risk (Chances per Million) by Duration of Residency at the Project Site				
		5 Years	7 Years	20 Years	35 Years	50 Years
NW corner of building	DPM	0.332	0.465	1.328	2.324	3.320
	TOG	0.590	0.826	2.360	4.130	5.900
	Stationary	0.299	0.299	0.299	0.299	0.299
	<b>Total</b>	<b>1.221</b>	<b>1.590</b>	<b>3.987</b>	<b>6.753</b>	<b>9.520</b>
NE corner of building	DPM	0.328	0.459	1.311	2.295	3.278
	TOG	0.583	0.816	2.332	4.082	5.831
	Stationary	0.299	0.299	0.299	0.299	0.299
	<b>Total</b>	<b>1.210</b>	<b>1.574</b>	<b>3.943</b>	<b>6.676</b>	<b>9.408</b>
SE corner of building	DPM	0.173	0.242	0.691	1.210	1.728
	TOG	0.367	0.514	1.468	2.570	3.671
	Stationary	0.299	0.299	0.299	0.299	0.299
	<b>Total</b>	<b>0.839</b>	<b>1.055</b>	<b>2.459</b>	<b>4.078</b>	<b>5.698</b>
SW corner of building	DPM	0.173	0.242	0.691	1.210	1.728
	TOG	0.368	0.516	1.474	2.579	3.684
	Stationary	0.299	0.299	0.299	0.299	0.299
	<b>Total</b>	<b>0.840</b>	<b>1.057</b>	<b>2.464</b>	<b>4.087</b>	<b>5.711</b>
Middle of north side of building	DPM	0.328	0.459	1.311	2.295	3.278
	TOG	0.583	0.816	2.332	4.082	5.831
	Stationary	0.299	0.299	0.299	0.299	0.299
	<b>Total</b>	<b>1.210</b>	<b>1.574</b>	<b>3.943</b>	<b>6.676</b>	<b>9.408</b>
Middle of east side of building	DPM	0.228	0.319	0.911	1.594	2.277
	TOG	0.454	0.636	1.816	3.179	4.541
	Stationary	0.299	0.299	0.299	0.299	0.299
	<b>Total</b>	<b>0.981</b>	<b>1.254</b>	<b>3.026</b>	<b>5.071</b>	<b>7.117</b>
Middle of south side of building	DPM	0.173	0.242	0.691	1.210	1.728
	TOG	0.367	0.514	1.468	2.570	3.671
	Stationary	0.299	0.299	0.299	0.299	0.299
	<b>Total</b>	<b>0.839</b>	<b>1.055</b>	<b>2.459</b>	<b>4.078</b>	<b>5.698</b>
Middle of west side of building	DPM	0.223	0.313	0.894	1.564	2.235
	TOG	0.453	0.634	1.810	3.168	4.525
	Stationary	0.299	0.299	0.299	0.299	0.299
	<b>Total</b>	<b>0.975</b>	<b>1.246</b>	<b>3.003</b>	<b>5.031</b>	<b>7.059</b>
Typical exposure scenario	DPM	0.257	0.360	1.030	1.802	2.575
	TOG	0.446	0.624	1.783	3.119	4.456
	Stationary	0.299	0.299	0.299	0.299	0.299
	<b>Total</b>	<b>1.002</b>	<b>1.283</b>	<b>3.112</b>	<b>5.221</b>	<b>7.330</b>
BAAQMD significance threshold		10	10	10	10	10
Maximum impact above BAAQMD Threshold?		No	No	No	No	No

DPM = diesel particulate matter

PM2.5 = fine particulate matter

TOG = total organic gases

Source: Tetra Tech, 2011

**Impact AQ-4: The proposed project would not create objectionable odors affecting a substantial number of people. (No Impact)**

The project would not result in a perceptible increase or change in odors on the project site or in the vicinity of the project, as it would not include uses prone to generating odors. In addition, surrounding land uses are not sources of noticeable odors and so would not adversely affect project residents. Therefore, the proposed project would have **no impact** on generation or reception of objectionable odors.

**Impact AQ-5: The proposed project would not result in a cumulatively considerable net increase in criteria air pollutants or otherwise conflict with regional air quality plans. (Less Than Significant)**

The proposed project would be generally consistent with the Air Quality element of the General Plan and air quality management plans, such as the 2010 Clean Air Plan. In addition to the proposed project, other projects recommended for analysis of cumulative air quality impacts in accordance with the BAAQMD CEQA *Guidelines* include the projects within 1,000 feet of the project site, including 2353 Lombard Street. The 2353 Lombard Street project would involve more demolition and construction than would be required by the proposed project; however, the Lombard Street project is below the BAAQMD screening thresholds for both construction and operational emissions analyses. Traffic generated by the 2353 Lombard Street project may be less than traffic previously generated by the commercial uses at that site. Consequently, cumulative emissions from both the proposed project and the 2353 Lombard Street project clearly would be less than the BAAQMD air quality impact thresholds for cumulative project analyses.

Accordingly, the proposed project would not contribute considerably to cumulative air quality impacts, nor would it interfere with adopted plans developed to improve air quality toward attaining the state and federal air quality standards. As such, operational characteristics of the proposed project would result in **less than significant** cumulatively considerable increases in regional air pollutants.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>8. GREENHOUSE GAS EMISSIONS</b> <b>Would the project</b>					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Under CEQA criteria, a project would have significant impacts on greenhouse gas (GHG) emissions if it were to significantly generate GHG emissions or conflict with any applicable plan, policy, or regulation related to the emission of GHG.

Gases that trap heat in the atmosphere are referred to as GHGs because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as the driving force for global climate change. The primary GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor.

While the presence of the primary GHGs in the atmosphere are naturally occurring, carbon dioxide, methane, and nitrous oxide are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. Greenhouse gases are typically reported in "carbon dioxide-equivalent" measures (CO<sub>2</sub>E units).<sup>39</sup>

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a

<sup>39</sup>Because of the differential heat absorption potential of various GHGs, emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.



global rise in sea level, impacts on agriculture, changes in disease vectors, and changes in habitat and biodiversity.<sup>40</sup>

The Air Resources Board (ARB) estimated that in 2006 California produced about 484 million gross metric tons of CO<sub>2</sub>E (MMTCO<sub>2</sub>E), or about 535 million U.S. tons.<sup>41</sup> The ARB found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 22 percent and industrial sources at 20 percent. Commercial and residential fuel use (primarily for heating) accounted for 9 percent of GHG emissions.<sup>42</sup> In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) and the industrial and commercial sectors are the two largest sources of GHG emissions, each accounting for approximately 36 percent of the Bay Area's 95.8 MMTCO<sub>2</sub>E emitted in 2007.<sup>43</sup> Electricity generation accounts for approximately 16 percent of the Bay Area's GHG emissions followed by residential fuel usage at 7 percent, off-road equipment at 3 percent and agriculture at 1 percent.<sup>44</sup>

### *Regulatory Setting*

In 2006, the California legislature passed AB 32 (California Health and Safety Code Division 25.5, Sections 38500, et seq.), also known as the Global Warming Solutions Act. AB 32 requires ARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

Pursuant to AB 32, ARB adopted a Scoping Plan in December 2008, outlining measures to meet the 2020 GHG reduction limits. In order to meet these goals, California must reduce its GHG emissions by 30 percent below projected 2020 business as usual emissions levels, or about 15 percent from today's

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<sup>40</sup>California Climate Change Portal. Frequently Asked Questions About Global Climate Change. Internet website: <http://www.climatechange.ca.gov/publications/faqs.html>. Accessed November 8, 2010.

<sup>41</sup>California Air Resources Board (ARB), "California Greenhouse Gas Inventory for 2000-2006 — by Category as Defined in the Scoping Plan." Internet website: [http://www.arb.ca.gov/cc/inventory/data/tables/ghg\\_inventory\\_scopingplan\\_2009-03-13.pdf](http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_2009-03-13.pdf). Accessed March 2, 2010.

<sup>42</sup>*Ibid.*

<sup>43</sup>Bay Area Air Quality Management District, Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007, Updated: February 2010. Internet website: [http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007\\_2\\_10.ashx](http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.ashx). Accessed March 2, 2010.

<sup>44</sup>*Ibid.*

levels.<sup>45</sup> The Scoping Plan estimates a reduction of 174 MMTCO<sub>2</sub>E (about 191 million U.S. tons) from the transportation, energy, agriculture, forestry, and high global warming potential sectors, see Table 8, below. ARB has identified an implementation timeline for the GHG reduction strategies in the Scoping Plan.<sup>46</sup> Some measures may require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Additionally, some emissions reductions strategies may require their own environmental review under CEQA or the National Environmental Policy Act.

**Table 8 – GHG Reductions from the AB 32 Scoping Plan Sectors<sup>47</sup>**

<b>GHG Reduction Measures By Sector</b>	<b>GHG Reductions (MMT CO<sub>2</sub>E)</b>
Transportation Sector	62.3
Electricity and Natural Gas	49.7
Industry	1.4
Landfill Methane Control Measure (Discrete Early Action)	1
Forestry	5
High Global Warming Potential GHGs	20.2
Additional Reductions Needed to Achieve the GHG Cap	34.4
<b>Total</b>	<b>174</b>
<b>Other Recommended Measures</b>	
Government Operations	1-2
Agriculture- Methane Capture at Large Dairies	1
Methane Capture at Large Dairies	1
Additional GHG Reduction Measures	
Water	4.8
Green Buildings	26
High Recycling/ Zero Waste	9
<ul style="list-style-type: none"> <li>• Commercial Recycling</li> <li>• Composting</li> <li>• Anaerobic Digestion</li> <li>• Extended Producer Responsibility</li> <li>• Environmentally Preferable Purchasing</li> </ul>	
<b>Total</b>	<b>42.8-43.8</b>

<sup>45</sup>California Air Resources Board, California's Climate Plan: Fact Sheet. Internet website: [http://www.arb.ca.gov/cc/facts/scoping\\_plan\\_fs.pdf](http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf). Accessed March 4, 2010.

<sup>46</sup>California Air Resources Board. AB 32 Scoping Plan. Internet website: [http://www.arb.ca.gov/cc/scopingplan/sp\\_measures\\_implementation\\_timeline.pdf](http://www.arb.ca.gov/cc/scopingplan/sp_measures_implementation_timeline.pdf). Accessed March 2, 2010.

<sup>47</sup>Ibid.

AB 32 also anticipates that local government actions will result in reduced GHG emissions. ARB has identified a GHG reduction target of 15 percent from current levels for local governments themselves and notes that successful implementation of the plan relies on local governments' land use planning and urban growth decisions because local governments have primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions.

The Scoping Plan relies on the requirements of Senate Bill (SB) 375 to implement the carbon emission reductions anticipated from land use decisions. SB 375 was enacted to align local land use and transportation planning to further achieve the State's GHG reduction goals. SB 375 requires regional transportation plans, developed by Metropolitan Planning Organizations (MPOs), to incorporate a "sustainable communities strategy" in their regional transportation plans (RTPs) that would achieve GHG emission reduction targets set by ARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 would be implemented over the next several years and the Metropolitan Transportation Commission's 2013 RTP would be its first plan subject to SB 375.

SB 97 required the Office of Planning and Research (OPR) to amend the state CEQA guidelines to address the feasible mitigation of GHG emissions or the effects of GHGs. In response, OPR amended the CEQA guidelines to provide guidance for analyzing GHG emissions. Among other changes to the CEQA Guidelines, the amendments add a new section to the CEQA Checklist (CEQA Guidelines Appendix G) to address questions regarding the project's potential to emit GHGs.

The *2010 CEQA Air Quality Guidelines* provide for the first time CEQA thresholds of significance for GHG emissions. OPR's amendments to the *CEQA Guidelines* as well as BAAQMD's *2010 CEQA Air Quality Guidelines* and thresholds of significance have been incorporated into this analysis accordingly. On August 12, 2010, the San Francisco Planning Department submitted a draft of the City and County of San Francisco's *Strategies to Address Greenhouse Gas Emissions* to the BAAQMD.<sup>48</sup> This document presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's Qualified Greenhouse Gas Reduction Strategy, in compliance with the BAAQMD's *2010 CEQA Air Quality Guidelines* and thresholds of significance.

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<sup>48</sup>San Francisco Planning Department. *Strategies to Address Greenhouse Gas Emissions in San Francisco*. 2010. Internet website: <http://www.sfplanning.org/index.aspx?page=1570>.



San Francisco's GHG reduction strategy identifies a number of mandatory requirements and incentives that have measurably reduced GHG emissions, including increasing the energy efficiency of new and existing buildings, installing solar panels on building roofs, implementing a green building strategy, adopting a zero waste strategy, passing a construction and demolition debris recovery ordinance, offering a solar energy generation subsidy, incorporating alternative fuel vehicles into the City's transportation fleet (including buses and taxis), and imposing a mandatory composting ordinance. The strategy also identifies 42 specific regulations for development that would reduce a project's GHG emissions.

San Francisco's climate change goals, as identified in the 2008 Greenhouse Gas Reduction Ordinance, are as follows:

- By 2008, determine the City's 1990 GHG emissions, which are set to the baseline level of target reductions;
- Reduce GHG emissions by 25 percent below 1990 levels by 2017;
- Reduce GHG emissions by 40 percent below 1990 levels by 2025; and
- Reduce GHG emissions by 80 percent below 1990 levels by 2050.

The City's 2017 and 2025 GHG reduction goals are more aggressive than the State's GHG reduction goals, as outlined in AB 32, and are consistent with the State's 2050 GHG reduction goals. San Francisco's *Strategies to Address Greenhouse Gas Emissions* identifies the City's actions to pursue cleaner energy, energy conservation, and alternative transportation and solid waste policies. It concludes that San Francisco's policies have reduced GHG emissions below 1990 levels, meeting statewide AB 32 GHG reduction goals. As reported, San Francisco's 1990 GHG emissions were approximately 8.26 MMTCO<sub>2</sub>E, and 2005 GHG emissions are estimated at 7.82 MMTCO<sub>2</sub>E, representing an approximately 5.3 percent reduction in GHG emissions below 1990 levels.

The BAAQMD reviewed San Francisco's *Strategies to Address Greenhouse Gas Emissions* and concluded that the strategy meets the criteria for a Qualified GHG Reduction Strategy, as outlined in BAAQMD's CEQA guidelines. The GHG Reduction Strategy provides standards to establish thresholds of significance when conducting analysis for CEQA documents. The BAAQMD further stated that San Francisco's "aggressive GHG reduction targets and comprehensive strategies help the

Bay Area move toward reaching the State's AB 32 goals, and also serve as a model from which other communities can learn."<sup>49</sup>

**Impact GG-1: The proposed project would generate greenhouse gas emissions, but not in levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (Less than Significant)**

Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from electricity providers, energy required to pump, treat, and convey water, and emissions associated with landfill operations.

The proposed project would increase the activity on-site by a net addition of 33 daily vehicle trips, compared to the 117 daily vehicle trips generated by the hotel use. The project would also create a residential population in place of the hotel's transient guests. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and residential operations associated with energy use, water use and wastewater treatment, and solid waste disposal. Construction activities would also result in a minor increase in GHG emissions. Based on the BAAQMD's 2010 *CEQA Air Quality Guidelines*, projects that are consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions* would result in a less than significant impact with respect to GHG emissions. Furthermore, because San Francisco's strategy is consistent with AB 32 goals, projects that are consistent with San Francisco's strategy would also not conflict with the State's plan for reducing GHG emissions. As discussed in San Francisco's *Strategies to Address Greenhouse Gas Emissions*, new development and renovations/alterations for private projects and municipal projects are required to comply with San Francisco's ordinances that reduce greenhouse gas emissions. Applicable requirements are shown below in Table 9.

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<sup>49</sup>Letter from Jean Roggenkamp, BAAQMD, to Bill Wycko, San Francisco Planning Department. October 28, 2010. .

**Table 9 – Regulations Applicable to the Proposed Project**

<b>Regulations</b>	<b>Project Requirements</b>
Commuter Benefits Ordinance (Environment Code, Section 421)	The building owner/operator offers all employees a Pre-Tax Election program that complies with the terms of the Environment Code.
Emergency Ride Home Program	The building owner/operator participates in the San Francisco Emergency Ride Home program.
Bicycle parking in residential buildings (Planning Code, Section 155.5)	The proposed project would comply with the Planning Code Section 155.5 by providing 9 Class I spaces in the building basement.
Parking requirements for San Francisco's Mixed-Use zoning districts (Planning Code Section 151.1)	The proposed project does not include any car-parking spaces.
San Francisco Green Building Requirements for Energy Efficiency (SF Building Code Chapter 13C)	The project will exceed Title 24 requirements by more than 15% and will meet LEED Silver certification criteria. EnergyStar-rated appliances would be used. In addition, green energy devices, including solar panels if feasible, would be included for project operation.
Residential Water Conservation Ordinance (SF Building Code, Housing Code, Chapter 12A)	The proposed project would meet LEED Silver certification. Low-water use showerheads, faucets, and other water sources will be employed.
Residential Energy Conservation Ordinance (SF Building Code, Housing Code, Chapter 12)	The rehabilitation scope would include inspecting steam and hot water pipes and tanks, insulating those that are currently uninsulated and cleaning and tuning the boiler. The boiler is currently on a time-clock and a recent inspection showed no leaks.
San Francisco Green Building Requirements for solid waste (SF Building Code, Chapter 13C)	The proposed project would be in compliance with City Ordinance 100-09, the Mandatory Recycling and Composting Ordinance which requires everyone in San Francisco to separate their refuse into recyclables, compostables, and trash.
Mandatory Recycling and Composting Ordinance (Environment Code, Chapter 19)	The project's residents and employees would participate in the City's recycling and composting programs and other efforts to reduce the solid waste disposal stream.
San Francisco Green Building Requirements for construction and demolition debris recycling (SF Building Code, Chapter 13C)	The proposed project would include minor interior and exterior alterations to the existing building at 3155 Scott Street. The project sponsor would comply with the San Francisco Building Code Chapter 13C by diverting from landfills a minimum of 75% of all construction and demolition debris.

In addition to the regulations listed above, the proposed project would meet LEED Silver certification criteria to further reduce the project's GHG emissions. The proposed project would include solar panels, if feasible, for project operation.



The proposed project would be consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions*<sup>50</sup> by complying with all the applicable regulations documented in the *Compliance Checklist*<sup>51</sup> and in Table 9 above. As such, the proposed project would result in a **less than significant** impact with respect to GHG emissions.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
<b>9. WIND AND SHADOW—Would the project:</b>					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project would have significant wind and shadow impacts under CEQA if it would substantially alter wind patterns in public areas, or create new shadows in outdoor recreational facilities or public areas.

**Impact WS-1: The proposed project would not impact wind patterns. (No Impact)**

Wind impacts are generally caused by large building masses extending substantially above their surroundings and by buildings oriented such that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. The proposed project would not substantially alter the exterior envelope of the building and so would not result in adverse effects on ground level winds. Thus, the proposed project would have **no impact** on wind patterns in the project vicinity.

**Impact WS-2: The proposed project would not create any new shadow in a manner that would affect outdoor recreational facilities or public areas. (No Impact)**

Section 295 of the Planning Code was adopted in response to Proposition K (passed November 1984) to protect certain public open spaces from shadowing by new structures from one hour after sunrise to one hour before sunset, annually. Section 295 restricts new shadows on public spaces under the

<sup>50</sup>San Francisco Planning Department. *Greenhouse Gas Analysis: Compliance Checklist*. November 24, 2010. This document is available for review at the Planning Department 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File No. 2010.0420E.

<sup>51</sup>*Ibid.*

jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet, unless the City Planning Commission finds the impact to be insignificant. There are no recreation or open spaces next to the proposed project. Further, the proposed project would not increase the height or bulk of the building and would therefore not cast new shadows. Because of this, no shadow study was required by the provisions of Section 295, and no impact would occur. Thus, the proposed project would not create new shadows in a manner that substantially affect outdoor recreation facilities or other public areas. As such, the proposed project would create **no impact** from shadows on any public open space.

**Impact WS-3: The proposed project in combination with past, present, or reasonably foreseeable projects would not result in cumulative wind and shadow impacts. (No Impact)**

The project would entail minor façade alternations and major interior configurations and would have **no impact** related to wind or shadow.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>10. RECREATION—Would the project:</b>					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Under CEQA criteria, a project would have significant recreation impacts if it were to increase the use and physically deteriorate recreation facilities or require the construction or expansion of recreation facilities.

**Impact RE-1: The proposed project would not substantially increase in the use of existing parks and recreation facilities or the deterioration of these facilities. (Less than Significant)**

The project site does not include open space, and the proposed project would not provide any open space. Future residents would use parks and recreation facilities in the area. The following parks and recreation facilities are located within half a mile of the project site: the Presidio (0.3 mile), the Palace of

Fine Arts (0.4 mile), George Moscone Recreation Center (0.4 mile), Alta Plaza Park (0.5 mile), Marina Green (0.5 mile), Exploratorium (0.4 mile), San Francisco Bay (0.4 mile), and the Fort Mason complex (approximately 0.5 mile). The additional use of the recreation facilities by project residents would be relatively minor, compared with the existing use, so the proposed project would not result in any potentially significant physical deterioration or degradation of recreation resources. Therefore, the impact on existing recreation facilities would be **less than significant**.

**Impact RE-2: The proposed project would not require the construction or expansion of recreational facilities. (No Impact)**

Future residents could use the existing recreational facilities located within the project area. The addition of 25 residents would incrementally increase the demand for park and recreation services and facilities in the area but not in excess of the amounts provided for in the project vicinity, given the choice and proximity of park and recreation options. The proposed project does not include or require the construction or expansion of recreational facilities. The increase in demand would not be in excess of amounts expected and provided for in the project area and the City as a whole. Therefore, the proposed project would not require the construction or expansion of recreational facilities. As such, it would have **no impact** from the construction or expansion of recreation facilities.

**Impact RE-3: The proposed project in combination with past, present, or reasonably foreseeable projects would not result in significant cumulative impacts on recreational resources. (Less than Significant)**

The project site is in an area well served by numerous park and recreation facilities within a one-mile radius in all directions. The addition of 25 residents to the area would not require additional off-site park facilities and would not significantly impact existing facilities. Therefore, the proposed project would not result in cumulatively considerable impacts on recreation resources, and this impact is considered to be **less than significant**.



<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>11. UTILITIES AND SERVICE SYSTEMS—Would the project:</b>					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The utilities and public services serving the project site include wastewater collection and transfer, stormwater drainage, solid waste collection, and water facilities. Under the proposed project, a 29-room hotel would be replaced with 25 group housing units, with 1,856 square feet of supportive services and community space. The hotel's need for public utilities and service systems may have been higher than that of the proposed project during full occupancy periods. However, the conversion of the 29-room hotel into 25 units of group housing could increase demand for public services and utilities and would add to cumulative water and energy consumption, but not in excess of amounts projected by agencies responsible for management of those services and utilities. Under CEQA criteria, a project would have significant impacts on utilities and services if it were to increase wastewater treatment requirements, require the construction of new water or wastewater treatment facilities, require the construction or expansion of new drainage facilities, exceed the capacity of the wastewater treatment provider, exceed the landfill permitted capacity, or violate any federal, state, or local regulations related to solid waste.

**Impact UT-1: The proposed project would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board, require or result in the construction of new, or expansion of existing, water, wastewater treatment facilities, or stormwater drainage facilities, and the proposed project would be adequately served by the City's wastewater treatment provider. (Less than Significant)**

The proposed project would not require new wastewater or stormwater collection and treatment facilities. The project site is entirely covered with impervious surfaces, so the proposed project would not affect the amount of stormwater discharged from the project site. The minor increase in population at the project site would incrementally increase the demand for wastewater treatment; however, it would not cause the collection treatment capacity to be exceeded or require the wastewater treatment facilities to be expanded or a sewer line to be extended. Project-related wastewater and stormwater would continue to flow into the City's combined stormwater and sewer system and would be treated to the standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant, before discharging into San Francisco Bay. Therefore, the proposed project would have a **less than significant** impact on San Francisco's wastewater and stormwater systems.

**Impact UT-2: The proposed project would increase the amount of water used on the site but would be adequately served by existing entitlements and water resources. (Less than Significant)**

The proposed project would add permanent residential units to the site, which might result in a slight net increase in the demand for water supply, but not in excess of amounts expected and provided for in the project area. The projected water consumption for the project site was accounted for in the SFPUC's 2005 Final Urban Water Management Plan (UWMP) and in the Final Water Supply Availability Study for the City and County of San Francisco.<sup>52</sup> Due to their programmatic nature, these studies did not specifically analyze the anticipated water needs of the proposed project; rather, they were based on anticipated water supply and availability projections, which were themselves based on land use and population forecasts from ABAG and other sources. Given that the proposed resident population is well within the future population projection levels analyzed in the studies, the water supply needs for the project can be met by existing sources. Therefore, the proposed project would not need new or expanded water supplies or services. In addition, water conservation measures would be incorporated

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<sup>52</sup>The SFPUC's 2005 UWMP is based on data presented in the ABAG's Projections 2002: Forecasts for the San Francisco Bay Area to the Year 2025, which includes all known or expected development projects in San Francisco through 2025.

into the proposed project's design, such as low-flush toilets and low-volume showers. This complies with California State Building Code Section 402.0(c) and LEED Silver certification requirements. Therefore, the proposed project would have a **less than significant** impact on existing and projected water supplies.

**Impact UT-3: The proposed project would increase the amount of solid waste generated on the project site but would be adequately served by the City's landfill and would comply with federal, state, and local statutes and regulations related to solid waste. (Less than Significant)**

Solid waste generated by the City and County of San Francisco is transported to the Altamont Landfill. This landfill has a permitted peak maximum disposal capacity of 11,150 tons per day and is operating well below that capacity, at approximately 4,000 to 5,000 tons per day. In addition, the landfill has an annual solid waste capacity of 2,226,500 tons from the City and County of San Francisco. However, the landfill is well below its allowed capacity, receiving approximately 1.29 million tons of solid waste in 2007, the most recent data year available. The total permitted capacity for the landfill is 62 million cubic yards; the remaining capacity is approximately 45.7 million cubic yards.<sup>53</sup>

Recycling, composting, and waste reduction are expected to increasingly divert waste from the landfill, per California and local requirements. The City was required by the State's Integrated Waste Management Act (AB 939) to divert 50 percent of its waste stream from landfill disposal by 2000. The City met this threshold in 2003 and has since increased it to 69 percent in 2005 and 70 percent in 2006. In addition, the Board of Supervisors adopted a plan in 2002 to recycle 75 percent of annual wastes generated by 2010.

The proposed project would be in compliance with the San Francisco Building Code Chapter 13 C, which requires a minimum of 75 percent of all construction and demolition debris to be recycled and diverted from landfills. Furthermore, the proposed project would be in compliance with City Ordinance 100-09, the Mandatory Recycling and Composting Ordinance which requires everyone in San Francisco to separate their refuse into recyclables, compostables, and trash. The project's residents and employees would participate in the City's recycling and composting programs and other efforts to reduce the solid waste disposal stream. The Altamont Landfill is expected to remain operational until

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<sup>53</sup>California Integrated Waste Management Board, Active Landfill Profiles, Altamont Landfill. Internet website: <http://www.calrecycle.ca.gov/Profiles/Facility/Landfill/LFProfile1.asp?COID=1&FACID=01-AA-0009>. Accessed November 10, 2010



at least 2029 and has plans to increase capacity by 250 additional acres.<sup>54</sup> With the City's increase in recycling and the potential Altamont Landfill expansion, the City's solid waste disposal demand could be met through at least 2029. Given the existing and anticipated increase in solid waste recycling and the proposed landfill expansion, the project would have a **less than significant** impact on solid waste facilities.

**Impact UT-4: The proposed project, in combination with other past, present, or reasonably foreseeable projects, would result in less than significant impacts on utilities and service systems. (Less than Significant)**

The proposed project would not require new or expanded utilities or service systems. Cumulative developments in the project area, including the residential developments on 2353 Lombard Street and 2774-2776 Filbert Street would incrementally increase demand on City's utilities and service systems. Given that the City's existing service management plans address anticipated growth in the region, the project in combination with other cumulative projects, would not be expected to have cumulatively considerable impacts on utility service provision or facilities under future conditions. The project would not contribute considerably to cumulative impacts related to utilities and service systems. Therefore, the proposed project would result in **less than significant** impacts on utilities and service systems.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>12. PUBLIC SERVICES— Would the project:</b>					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is already served by public services, including police and fire protection, schools, and parks. Under CEQA criteria, a project would have significant impacts on public services if it were to

<sup>54</sup>Ibid.

substantially affect the service ratios or response times of any public service, which would necessitate the need for new or expanded governmental facilities.

**Impact PS-1: The proposed project would result in less than significant impacts on public services, including police and fire protection and schools and parks. (Less than Significant)**

*Police Protection Services*

The project site is serviced by the Northern Police District of the San Francisco Police Department (District). The closest police station is the Northern Police Station at 1125 Fillmore Street, approximately 1.5 miles from the site. Development of the proposed project would bring 25 residents and seven employees to the site, replacing the hotel, which contained 29 guest rooms and included four employees. The project would include one on-site resident manager, who would enforce operational rules, including proposed quiet hours. In addition, the project would include a security system (with exterior video monitoring and door and window alarms). With the permanent presence of the resident manager and the security system, the demand for police services would not be significantly impacted by the proposed project and no new or modified police protection facilities would be needed. The total number of emergency calls received by the District from the period of May 1, 2009 to April 30, 2010 was 30,832 service calls, of which 167 calls were received from the Bridge Motel, a 53-room motel used as a Single Room Occupancy facility located at 2524 Lombard Street.<sup>55</sup> During that same period, the District received 46 calls from the Ellis Street Apartments, a 24-unit group housing facility managed by Larkin Street Youth Services and located at 864 Ellis Street.<sup>56</sup> The estimated additional number of calls that may be generated by the proposed project are expected to be similar to the number of calls generated by the Ellis Street Apartments, given the similarity in uses and resident population. Therefore, the number of calls that may result from the proposed project would be negligible compared with the existing number of calls handled by the District. As such, the proposed project would have a **less than significant** impact on police protection services.

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<sup>55</sup>Department of Emergency Management, Division of Emergency Communications – Custodian of Records, 1011 Turk Street, San Francisco, CA 94102. Data retrieved on January 21, 2011. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.

<sup>56</sup>Department of Emergency Management, Division of Emergency Communications – Custodian of Records, 1011 Turk Street, San Francisco, CA 94102. Data retrieved on May 11, 2010. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.

### *Fire Protection Services*

The project site is serviced by San Francisco Fire Department Station 16, located four blocks away at 2251 Greenwich Street at Fillmore Street. Although the project would feature primarily interior alterations, they would be subject to review by the San Francisco Fire Department for compliance with all applicable local and state codes and ordinances, as discussed below. The overall size and height of the building would not be increased, and the scale of the project would not result in a substantial increase in demand for fire protection services or in the need for new fire protection facilities that would result in impacts on the physical environment.

The project proponents would be required to comply with all regulations of the 2001 California Fire Code, which establishes requirements pertaining to fire protection systems, including providing state-mandated smoke alarms, fire extinguishers, appropriate building access, and emergency response notification systems. Therefore, the proposed project would result in a **less than significant** impact on fire protection services.

### *Schools*

The nearest public schools are Claire Lilienthal Alternative Elementary School, at 3850 Divisadero Street (0.41 mile from the site); Marina Middle School, at 3500 Fillmore Street (0.44 mile from the project site); and Galileo High School, at 1150 Francisco Street (1.12 miles from the project site). Of the 25 residents on site, 24 would be transitional-age youth, between the ages of 18 and 24. Because no school-age children would occupy the proposed project, there would be **no impact** on local elementary and secondary schools.

**Impact PS-2: The proposed project, in combination with other past, present, or reasonably foreseeable projects, would result in less than significant public service impacts. (Less than Significant)**

The project would result in the reuse of an existing building as a residential project for transitional-age youth. Project demand for public services, including police and fire protection, would exist but not beyond levels anticipated and planned for by public service providers. In addition, there would be no impact on local elementary or secondary schools, since the facility would provide housing to young adults ages 18 to 24. Cumulative development in the project area, including residential developments at 2353 Lombard Street and 2774-2776 Filbert Street, would incrementally increase demand for public services, including police, fire protection and schools, but not beyond levels anticipated and planned



for by public service providers. Thus, project-related impacts on public services would not contribute to cumulatively considerable impacts related to public services. Thus, cumulative impacts of the proposed project on public services would be **less than significant**.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>13. BIOLOGICAL RESOURCES— Would the project:</b>					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Under CEQA criteria, a project would have significant impacts on biological resources if it were to substantially affect candidate, sensitive, or special status species, riparian habitat or other sensitive natural community or wetlands, interfere with the movement of any migratory fish, wildlife, established native resident, or migratory wildlife corridors, conflict with local policies or ordinances related to biological resources, or conflict with any habitat conservation plan. There are no adopted

habitat conservation plans applicable to the project site, so criterion E.13.f is not applicable to the proposed project.

**Impact BI-1: The proposed project would have no impact on special status species, avian species, or riparian, wetland, or sensitive natural communities and would not conflict with an approved local, regional, or state habitat construction plan. (No Impact)**

The project site is in a long-developed urban area and is completely covered by impervious surfaces. Therefore, the site does not provide habitat for any rare or endangered plant or animal species, and the proposed project would not affect or diminish plant or animal habitats, including riparian or wetland habitat. The project would not interfere with any resident or migratory species, affect any rare, threatened, or endangered species, or involve tree removal. Therefore, the proposed project would have **no impact** on biological resources.

**Impact BI-2: The proposed project in combination with other past, present, or reasonably foreseeable projects would not result in impacts on biological resources. (No Impact)**

As described above, the project site does not contain biological resources, and the project would therefore have **no impact** on biological resources.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>14. GEOLOGY AND SOILS—</b> <b>Would the project:</b>					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Under CEQA criteria, a project would have significant impacts on geological resources if it were to expose people or structures to substantial risk from seismic activity, result in substantial soil erosion or landslide, be located on an expansive soil or soil incapable of adequately supporting a septic tank, or substantially change the topography. The project site, as indicated in Section E.11, Utilities and Service Systems, is served by the City's combined sewer system. Therefore, the project site would not require the use of septic systems and significance criterion E.14.e is not applicable to the project site.

**Impact GE-1: The proposed project would result in less than significant impacts from exposure of persons or structures to seismic and geologic hazards. (Less than Significant)**

The San Francisco Bay Area is one of most seismically active regions in the United States. Significant earthquakes have occurred in the region and will occur in the future. In 2003, the Working Group on California Earthquake Probabilities (WG2003), in conjunction with the United States Geological Survey, published an updated report evaluating the probabilities of significant earthquakes occurring in the Bay Area over the next three decades. They concluded that there is a 62 percent probability that at least one magnitude 6.7 or greater earthquake will occur in the San Francisco Bay region before 2031.

Earthquake intensities vary throughout the San Francisco Bay Area, depending on the magnitude of the earthquake, the distance of the site from the causative fault, the type of materials underlying the site, and other factors. The principal active faults in the Bay Area are the San Andreas, Hayward, Calaveras, and the San Gregorio. Although the project site is not within an Alquist-Priolo Earthquake Fault Zone, earthquakes occurring along these or other smaller or unmapped faults are capable of generating strong ground shaking at the project site. The proposed project would comply with the



latest California Building Code (CBC) requirements for construction and rehabilitation, which would reduce the associated risk of property loss and hazards to occupants to a less than significant level.

According to the United States Geological Survey<sup>57</sup>, the site is not within a liquefaction zone, so the potential impact for ground seismic shaking as a result of liquefaction is low.

The extent of hazards from seismic shaking depends on the specifics of the earthquake and the resistance of individual structures. Pre-1974 masonry structures are typically less resistant to seismic shaking damage than are newer wood and steel-framed structures, built in accordance with more recent building codes. Similarly, structures not adequately bolted to their foundations have a greater risk of damage than adequately secured structures.

The building at the project site is a three-story plus basement structure. The foundation is reinforced concrete, with continuous perimeter footings and interior footings. The proposed project includes minor structural stabilization in the basement. A building survey revealed that the subject property suffered no significant structural damage from the Loma Prieta earthquake on October 17, 1989.<sup>58</sup> The proposed project would incorporate all seismic improvements identified by the Department of Building Inspection during plan review.

Because incorporation of these improvements would minimize the risk of loss, injury, and death, the proposed project would have a **less than significant** impact related to seismic and geologic hazards. Further, the proposed project would have **no impact** related to landslides as the project site is flat and within a fully developed urban area.

**Impact GE-2: The proposed project would result in less than significant impacts on soil erosion or from loss of topsoil. (Less than Significant)**

The project site has an elevation of 22.4 feet per the San Francisco City Datum, and slopes slightly downward to the north. It is not in an erosion-sensitive area, on a steep slope, or in the vicinity of a natural watercourse. Further, the project site is fully covered with impervious surfaces, and the proposed project would not increase the amount of impervious surfaces. Construction would not

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<sup>57</sup>USGS. 2010. Susceptibility Map of the San Francisco Bay Area. Internet website: <http://geomaps.wr.usgs.gov/sfgeo/liquefaction/susceptibility.html>. Accessed on January 14, 2011.

<sup>58</sup>Basis Architecture and Consulting. 2010. Property Condition Assessment for Edward II Hotel, 3155 Scott Street, San Francisco, CA 94123. March 31, 2010. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.

require any excavation or disturbance of underlying soils, except for a shallow ground disturbance to install the elevator. The project proponents would be required to implement construction best management practices (BMPs) listed on the Stormwater Pollution Prevention Program "Checklist for Construction Requirements." They also would implement erosion and sedimentation control measures, as required by the City and resources agencies. Given that the site is already covered with impervious surfaces, the proposed project would not result in soil erosion or the loss of topsoil, and impacts from soil erosion or loss of topsoil would be considered **less than significant**.

**Impact GE-3: The proposed project would not result in changes to the topography or any unique geologic or physical features of the site. (No Impact)**

There are no unique geologic or physical features at the site, so the project would have **no impact** on soils or topography.

**Impact GE-4: The proposed project, in combination with past, present, or reasonably foreseeable projects, would result in less than significant impacts on geology and soils. (Less than Significant)**

Geology impacts are generally site specific and do not have cumulative effects with other projects. Other cumulative projects within the project vicinity could result in potential impacts on geological resources. However, project proponents would be required to comply with applicable regulations to reduce impacts on geological resources. Further, the proposed project does not contribute to cumulative impacts on geological resources. Thus, the proposed project would have **no cumulative impacts** on geological resources.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>15. HYDROLOGY AND WATER QUALITY— Would the project:</b>					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Under CEQA criteria, a project would have significant impacts from hydrology and water quality if it were to violate any water standard, degrade water quality, deplete groundwater supplies or recharge, alter existing drainage pattern in a manner that could erode or increase surface runoff, result in substantial additional source of polluted runoff, place housing or structures within a 100-year flood hazard area, or expose people or structures to a significant flood, seiche, tsunami, or mudflow risk.



**Impact HY-1: The proposed project would not violate any water quality standards or waste discharge requirements or impact water quality. (Less than Significant)**

The proposed project would not degrade water quality or contaminate a public water supply. As discussed in Section E.11, Utilities and Service Systems, the project site's wastewater and stormwater would continue to flow into the City's combined stormwater and sewer system and would be treated to the standards contained in the City's NPDES Permit for the Southeast Water Pollution Control Plant, before discharging to San Francisco Bay. Treatment would be provided in accordance with the effluent discharge standards contained in the City's NPDES permit for the plant. Construction of the proposed project would not impact stormwater runoff since only minor façade alterations and interior reconfiguration would be performed. During construction, there would be a potential for the transport of soil particles during the building alterations and shallow excavation activities to install the elevator. Once they are suspended in surface water runoff, sediment and other pollutants could leave the construction site and ultimately be released into San Francisco Bay.

Stormwater runoff would drain into the City's combined sewer and stormwater system and be treated at the Southeast Water Pollution Control Plant before discharging into San Francisco Bay. In accordance with the San Francisco Building Code and the City's NPDES permit, the project proponent would be required to implement measures to reduce potential erosion impacts. During operation and construction, the project proponent would be required to comply with all local wastewater discharge and water quality requirements. Therefore, the proposed project would not substantially degrade water quality, and impacts on water quality would be **less than significant**.

**Impact HY-2: The proposed project would not deplete groundwater supplies, interfere with groundwater recharge, or otherwise alter the existing drainage pattern resulting in erosion or flooding on- or off-site. (No Impact)**

The proposed project would not affect groundwater or alter the existing drainage pattern of the site. The proposed project does not involve the alteration of any hydrologic features, such as a stream or river. The project site is completely covered with impervious surfaces, so the proposed project would not increase the amount of surface runoff that drains into the City's combined sewer system. The proposed project would require minor excavation of up to three feet for installing the elevator. The

Phase I Environmental Site Assessment (ESA) prepared for the project site by SCA Environmental<sup>59</sup> stated that shallow groundwater is at 8 to 30 feet below ground surface, so groundwater would not be encountered during construction, and the proposed project would not alter existing groundwater or surface flow conditions; therefore, there would be **no impact** on groundwater or site runoff.

**Impact HY-3: The proposed project would not result in an increase in risks from flood, tsunami, seiche, or mudflow. (No Impact)**

Flood risk assessment and some flood protection projects are conducted by federal agencies, including the Federal Emergency Management Agency (FEMA) and the U.S. Army Corps of Engineers. The flood management agencies and cities implement the National Flood Insurance Program under the jurisdiction of FEMA and its Flood Insurance Administration. Currently, the City of San Francisco does not participate in the National Flood Insurance Program, and no flood maps are published for the City. However, FEMA is preparing Flood Insurance Rate Maps (FIRMs) for the City and County of San Francisco for the first time. FIRMs identify areas that are subject to inundation during a flood having a one percent chance of occurrence in a given year (also known as a "base flood" or "100-year flood"). FEMA refers to the flood plain that is at risk from a flood of this magnitude as a special flood hazard area ("SFHA").

FEMA has tentatively identified SFHAs along the City's shoreline in and along the San Francisco Bay consisting of Zone A (in areas subject to inundation by tidal surge) and Zone V (areas of coastal flooding subject to wave hazards).<sup>60</sup> On June 10, 2008, the San Francisco Board of Supervisors introduced legislation to enact a floodplain management ordinance to govern construction and substantial improvements in flood prone areas of San Francisco and to authorize City participation in NFIP on passage of the ordinance. Once the Board of Supervisors adopts the Floodplain Management Ordinance, the Department of Public Works will publish flood maps for the City, and applicable City departments and agencies may begin implementing new construction and substantial improvements in areas shown on the interim floodplain map.

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<sup>59</sup>SCA Environmental, Inc. Phase I Environmental Site Assessment 3155 Scott Street Block: 0937 Lot :001 San Francisco CA. March 15, 2010. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.

<sup>60</sup>City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet. Internet website: <http://www.sfgsa.org/index.aspx?page=828>. Accessed on January 11, 2011.

According to the preliminary map, the project site is not in a flood zone designated on the preliminary map, and the proposed project would result in **no impact** related to placement of structures within a 100-year flood zone.

The project site is not within the tsunami inundation boundary, as defined on the California Emergency Management Agency Tsunami Inundation Map for Emergency Planning, San Francisco Bay Area,<sup>61</sup> therefore, no identified significant tsunami hazard exists at the site. A seiche is an oscillation of a water body, such as a bay, which may cause local flooding. A seiche could occur on San Francisco Bay due to seismic or atmospheric activity. However, seiches are rare and the site elevation is 22.4 feet per the San Francisco City Datum, rendering any impacts from a seiche highly unlikely. The site is not susceptible to mudslides because the site and vicinity are fully developed and are not in an area of erosion-prone slopes or related natural features. Therefore, the proposed project would have **no impact** from seiches, tsunamis, or mudflow hazards.

**Impact HY-4: The proposed project, in combination with past, present, or reasonably foreseeable projects, would result in less than significant hydrology and water quality impacts. (Less than Significant)**

The proposed project would have a less than significant impact on hydrology and water quality. Therefore, it would not significantly contribute to any potential cumulative impacts on hydrology and water quality. Cumulative development in the project area could result in intensified uses and a cumulative increase in wastewater generation. The SFPUC, which provides wastewater treatment for the City, has accounted for such growth in its service projections. Further, other cumulative projects within the vicinity of the project site, in particular the Presidio Parkway project, could result in significant runoff and erosion impacts. However, project proponents would be required to comply with the applicable regulations and apply best management practices to reduce impacts from increases in runoff and siltation. Therefore, cumulative impacts of the proposed project on hydrology and water quality would be **less than significant**.

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<sup>61</sup>California Emergency Management Agency, Tsunami Inundation Map for Emergency Planning, San Francisco Bay Area. Internet website: [http://www.consrv.ca.gov/cgs/geologic\\_hazards/Tsunami/Inundation\\_Maps/Documents/Tsunami\\_Inundation\\_SanFranciscoBayArea300.pdf](http://www.consrv.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/Documents/Tsunami_Inundation_SanFranciscoBayArea300.pdf). Accessed on November 10, 2010



Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
<b>16. HAZARDS AND HAZARDOUS MATERIALS</b>					
<b>Would the project:</b>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is not in an airport land use plan, nor is it in the vicinity of a private airstrip. Therefore, criteria E.16e and E.16f are not applicable to the proposed project.

**Impact HZ-1: The proposed project would not create a significant hazard through routine transport, use, disposal, handling, or emission of hazardous materials. (Less than Significant)**

Operation of the proposed project would involve use of common household cleaning materials for routine purposes, such as cleaners and disinfectants. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. Businesses are required by law to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers who handle hazardous materials, and adequately training workers. Therefore, hazardous

materials used during project operations would not pose any substantial public health or safety hazards related to hazardous materials. Thus, the proposed project would result in **less than significant** impacts from the use of hazardous materials.

**Impact HZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable conditions involving the release of hazardous materials into the environment. (Less than Significant)**

SCA Environmental prepared a Phase I ESA for the project site in March 2010. The Phase I ESA report lists current and past operations, reviews environmental agency databases and records, identifies site reconnaissance observations, and summarizes potential contamination issues about the project site. The Phase I ESA preparers concluded that there is no evidence of recognized environmental conditions in connection with project site. They noted the following building materials that may pose potential hazards to future development:

- Possible polychlorinated biphenyl (PCB)-containing light ballasts in fluorescent light fixtures;
- Possible asbestos-containing building materials;
- Possible naturally occurring asbestos in the soil;
- Possible lead-containing paints and coatings; and
- Possible mercury-containing items.

#### *PCBs and Mercury*

PCBs are regulated under federal and state law. Byproducts of PCB combustion are known carcinogens and are respiratory hazards, so specific handling and disposal of PCB-containing products is required. PCBs are most commonly found in lighting ballasts, wet transformers, and electrical equipment that uses dielectric fluids. PCBs are also occasionally found in hydraulic fluids.

There are PCB-containing lighting ballasts, in conjunction with mercury-containing fluorescent lighting fixtures, at the project site. The preparers of the Phase I ESA concluded that, in their current state, the ballasts are not an environmental concern. No electrical transformers, hydraulic equipment, or other potential PCB-containing equipment were observed on the project site. In accordance with the Occupational Safety and Health Administration, items containing PCBs and mercury that are intended for disposal must be managed as hazardous waste. These regulations and procedures, already

established as a part of the permit review process, ensure that potential project impacts from the presence of PCBs and mercury would be reduced to a **less than significant** level.

### *Asbestos*

Due to the age of the building at the project site, there is a potential for asbestos-containing materials (ACM) to be present. ACM contain greater than 1.0 percent asbestos. Trace ACM contain less than 1.0 percent but greater than 0.1 percent asbestos. These materials may be construction debris (in which case they fall under Comprehensive Environmental Response, Compensation, and Liability Act regulatory requirements), as materials in intact buildings (in which case they fall under the Toxic Substances Control Act and National Emissions Standards for Hazardous Air Pollutants requirements), or as geological deposits, in which case they are typically regulated by local air pollution control district standards.

Although an asbestos survey has not been completed for the project site, the following items were noted to be present and may contain asbestos:

- Wall and ceiling drywall, tape and mud with skim coats;
- Wall and ceiling plaster;
- Ceramic tiles, grouts, and mortars;
- Insulation on heating ducts, piping, and other HVAC components;
- Insulation on an abandoned boiler in the basement;
- Paints on radiators;
- Cement fiberboard (assumed present behind radiators);
- Electrical wiring;
- Roofing mastics, felts;
- Carpet mastics;
- Stucco;
- Exterior paints;
- Paints in basement and boiler areas;



- Window and door caulks and putties;
- Mastic behind textured wallpaper;
- Vinyl flooring and associated mastics; and
- Cement fiberboard liner for trash chutes in light wells.

The list above was based only on visible areas inspected by the contractor. Other suspect items may be present behind wall cavities or in ceilings at the project site.

Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The California Legislature has vested the BAAQMD with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement. BAAQMD is to be notified ten days in advance of any proposed demolition or abatement work. Notification includes the names and addresses of operations and persons responsible; a description and location of the structure to be demolished or altered, including size, age, and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be used; procedures to be used to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations and would inspect any removal operation for which it has received a complaint.

The local office of the Occupational Safety and Health Administration must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14, where there is asbestos-related work involving 100 square feet or more of ACM. Asbestos removal contractors must be certified as such by the Contractors State License Board. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a hazardous waste manifest that details the hauling of the material from the project site and the disposal of it. Pursuant to California law, the San Francisco DBI would not issue the required permit until the applicant has complied with the above notice requirements. Compliance with these regulations and procedures,

already established as a part of the permit review process, would ensure that potential impacts of demolition due to asbestos would be reduced to a **less than significant** level.

The preparers of the Phase I ESA noted the potential for soil at the site to contain naturally occurring asbestos. The proposed project would include minor excavation, so impacts related to naturally occurring asbestos would be **less than significant**.

#### *Lead-Based Paint (LBP)*

The Phase I ESA prepared for the project site concluded that based on the age of the building lead may be present in the interior and exterior surfaces including paint and glazing on ceramic tiles.

Renovation of the proposed project would comply with Chapter 34, Section 3407, of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Chapter 34 requires specific notification and work standards and identifies prohibited work methods and penalties. This would apply where there is any work that may disturb or remove lead paint on any building built on or before December 31, 1978, or on any steel structures where LBP would be disturbed or removed and where exterior work would disturb more than 100 square feet or 100 linear feet of LBP.

Section 3407 applies to buildings or steel structures built before 1979, which are assumed to have LBP on their surfaces unless a certified lead inspector assessor tests surfaces for lead and determines it is not present, according to the definitions of Section 3407. The ordinance contains performance standards, including establishment of containment barriers at least as effective at protecting human health and the environment as those in the Department of Housing and Urban Development Guidelines (the most recent guidelines for evaluation and control of lead-based paint hazards). The ordinance also identifies prohibited practices that may not be used when disturbing or removing LBP. Any person performing work subject to the ordinance should, to the maximum extent possible, protect the ground from contamination during exterior work, should protect floors and other horizontal surfaces from work debris during interior work and should make all reasonable efforts to prevent migration of lead-paint contaminants beyond containment barriers during the course of the work. Cleanup standards require the removal of visible work debris, including the use of a high efficiency particulate air filter vacuum following interior work.

Chapter 34, Section 3407, also includes notification requirements, information the notice should contain, and requirements for signs. Notification includes notifying project construction contractors of any paint-inspection reports that verify the presence or absence of LBP in the regulated area of the proposed project. Before work, the responsible party must provide written notice to the Director of the Division of Building Inspection of the following:

- Location of the project;
- The nature and approximate square footage of the painted surface being disturbed or removed;
- Anticipated job start and completion dates for the work;
- Whether the responsible party has reason to know or presume that LBP is present;
- Whether the building is residential or nonresidential, owner-occupied or rental property, approximate number of dwelling units, if any;
- The dates that the responsible party has or would fulfill any tenant or adjacent property notification requirements; and
- The name, address, telephone number, and pager number of the party who would perform the work.

Further notice requirements include posting signs when containment is required, the landlord notifying tenants of the impending work, the availability of a pamphlet about lead in the home, notice by contractor of the early commencement of work, and notice of lead-contaminated dust or soil, if applicable. The ordinance contains provisions regarding inspection and sampling for compliance by the Department of Building Inspection and enforcement and describes penalties for noncompliance.

The regulations and procedures established by the San Francisco Building Code would ensure that potential impacts from LBP disturbance during construction would be reduced to a level of insignificance. These regulations and procedures are already established as a part of the permit review process to further ensure their implementation. They would ensure that potential impacts of rehabilitation related to LBP would be reduced to a level of insignificance. Therefore, impacts of the proposed project from LBP would be **less than significant**.



**Impact HZ-3: The project site is not located within one-quarter mile of a school and therefore would not emit hazardous emissions or handle hazardous material within the vicinity of a school. (No Impact)**

There are no schools within a quarter-mile of the site, so the proposed project would not emit hazardous emissions or materials within one-quarter mile of a school; therefore, **no impact** would occur.

**Impact HZ-4: The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. (No Impact)**

The Phase I ESA prepared for the project site assessed possible environmental concerns from on-site or nearby chemical use, storage, handling, spillage, or on-site disposal, with particular focus on potential degradation of soil or groundwater quality.<sup>62</sup> The ESA preparers also reviewed the land use history of the project site and operating practices at or near the site to assess potential hazards from reported chemical releases on nearby properties and the potential migration of chemicals, contaminants, and toxics onto the project site. The ESA was performed in substantial conformance with guidelines of the American Society for Testing and Materials E 1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, and with the US Environmental Protection Agency's Rule for 40 CFR, 312, Standards and Practices for All Appropriate Inquiry, as published in the *Federal Register*, Volume 70, Number 210, on November 1, 2005.

The purpose of the Phase I ESA is to identify recognized environmental conditions at the project site. A recognized environmental condition is the presence or likely presence of hazardous substances or petroleum products that may indicate an existing, past, or future threat of a release of such material to the structures, soil, surface water, or groundwater at the project site. The Phase I ESA revealed no evidence of a recognized adverse environmental condition at the project site. Therefore, the proposed project would have **no impact** related to listing on hazardous materials sites.

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<sup>62</sup>SCA Environmental, Inc., Phase I Environmental Assessment, 3155 Scott Street, Block 0937 Lot: 001, March 15, 2010. This document is available for review in Project File No. 2010.0420E at the Planning Department, Fourth Floor, 1650 Mission Street, San Francisco.

**Impact HZ-5: The proposed project would not expose people or structures to a significant risk of loss, injury, or death involving fires and would not interfere with the implementation of an emergency response plan. (Less than Significant)**

San Francisco ensures fire safety and emergency accessibility within new and existing developments by its building and fire codes. The project would conform to these standards, which may include development of an emergency procedure manual and an exit drill plan for the proposed project. Potential fire hazards would be addressed during the permit review process. Conformance with these standards would ensure appropriate life safety protections for the residential structure. Therefore, the proposed project would not have a **less than significant** impact on fire hazards and interference with emergency access plans.

**Impact HZ-6: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less than significant impacts related to hazards and hazardous materials. (Less than Significant)**

Impacts from hazards are generally site-specific and typically do not result in cumulative impacts. Any hazards at nearby sites would be subject to the same safety requirements discussed for the proposed project above, which would reduce any hazard effects to **less than significant**. Overall, the proposed project would not contribute to cumulatively considerable significant effects related to hazards and hazardous materials.

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Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
<b>17. MINERAL AND ENERGY RESOURCES—</b>					
<b>Would the project:</b>					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local <i>General Plan</i> , specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Under CEQA criteria, a project would have significant impacts on minerals and energy resources if it were to result in the loss of a known mineral resource or a local, regional, or state-wide important mineral resource, or result in the use or waste of a large amount of fuel energy. All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Department of Mines and Geology (CDMG), under the Surface Mining and Reclamation Act of 1975 (CDMG, Open File Report 96-03 and Special Report 146 Parts I and II). This designation indicates that there is not adequate information available for assignment to any other MRZ, so the site is not a designated area of significant mineral deposits. However, because the project site is already developed, future evaluation or designation would not affect or be affected by the project. There are no potentially affected operational mineral resource recovery sites in the project vicinity.

**Impact ME-1: The proposed project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. (No Impact)**

No known mineral deposits are at the project site. The proposed project would not result in excavation or grading that could impact underlying mineral deposits or their availability; therefore, the proposed project would have **no impact** on mineral resources.

**Impact ME-2: Implementation of the proposed project would not encourage activities which would result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. (Less than Significant)**

The project would meet all applicable state and local codes concerning energy consumption, including Title 24 of the California Code of Regulations enforced by the DBI. Other than natural gas used to



generate electricity for the project, the project would not have a substantial effect on the use, extraction, or depletion of a natural resource.

San Francisco's 2002 Electricity Resource Plan discussed sources for electricity and projected citywide demand.<sup>63</sup> Pacific Gas & Electric's peak load forecast is approximately 1,200 megawatts, while the available capacity is over 1,700 megawatts. Any new developments, including the proposed project, would be expected to conform to new City policies designed to reduce energy consumption. The project-generated demand for electricity would be negligible in the context of the overall consumer demand in the city and the state. Further, the project would attempt to meet LEED Silver certification criteria. EnergyStar-rated appliances would be used. In addition, green energy devices, including solar panels, would be included for project operation. Therefore, the project would not, in and of itself, generate a significant demand for energy and a major expansion of power facilities since it would consist of residential group housing, and the anticipated energy usage would conform to typical residential uses taking into account the proposed density of the facility. Therefore, the project would not cause a wasteful use of energy and would have a **less than significant** effect on existing or proposed energy supplies or resources.

**Impact ME-3: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less than significant cumulative impacts on energy and minerals. (Less than Significant)**

As described above, no known minerals exist at the project site, and the proposed project would not entail excavating or grading that could disturb underlying mineral resources; therefore, the proposed project would not contribute to any cumulative impact on mineral resources. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco, the greater Bay Area, and the state and would not in and of itself require any expansion of power facilities. The City plans to reduce consumption by 107 megawatts by 2012 through various energy efficiency strategies. Therefore, the energy demand associated with the project would result in a less than significant physical environmental effect and therefore would not contribute to a cumulative impact on existing or proposed energy supplies or resources. Overall, the proposed project would result in **less than significant** cumulatively considerable impacts on minerals and energy resources.

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<sup>63</sup>San Francisco Public Utilities Commission and San Francisco Department of the Environment, The Electricity Resource Plan, 2002. Internet website: [http://sfwater.org/detail.cfm/MC\\_ID/12/MSD\\_ID/138/MTO\\_ID239/C\\_ID/1346](http://sfwater.org/detail.cfm/MC_ID/12/MSD_ID/138/MTO_ID239/C_ID/1346).

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
<b>18. AGRICULTURE AND FOREST RESOURCES:</b> In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.					
<b>—Would the project</b>					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Under CEQA criteria, a project would have significant impacts on agriculture and forest resources if it were to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, conflict with existing agricultural or forest land zoning, or result in the loss or conversion of forest land. Since the project site is not within a Williamson Act contract and is not on land defined as forest or timberland by the State Public Resources Code, criteria E.18b and E.18c are not applicable.

**Impact AF-1: The proposed project would not convert farmland and would not result in the loss or conversion of forest land. (No Impact)**

The project site is within an area of San Francisco that has been urbanized since the early twentieth century. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the site as Urban and Built-Up Land. The site does not contain agricultural uses and is not zoned for such uses. In addition, the project would not convert any prime farmland, unique farmland, or Farmland of Statewide Importance to nonagricultural use. Also, it would not result in the loss of

forest land or convert forest land to non-forest use and would therefore not conflict with any of the policies of the San Francisco Urban Forestry Ordinance.<sup>64</sup> Thus, the proposed project would have **no impact** on agricultural and forest resources.

**Impact AF-2: The proposed project, in combination with other past, present, or reasonably foreseeable projects, would not result in impacts on agricultural and forest resources. (No Impact)**

As described above, the project would have no impacts from agriculture and forestry resources. Therefore, the proposed project would not contribute to any cumulatively considerable impacts on agricultural and forest resources.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>19. MANDATORY FINDINGS OF SIGNIFICANCE— Would the project:</b>					
a) Have the potential to degrade the quality of the environment, conflict with an adopted land use plan, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The preparers of the Initial Study have discussed all of the environmental issue areas required by Section 15063 of the CEQA Guidelines and have found either no impact or less than significant impacts in most issue areas for the project. The analysis has found one air quality issue area to be less than significant with incorporation of **Mitigation Measure M-AQ-1**, agreed to by the project sponsor and determined to be feasible by the Lead Agency. Furthermore, the preparers found that the proposed

<sup>64</sup> San Francisco Public Works Code, Article 16



project would not have the potential to degrade the quality of the environment, reduce habitat or populations of fish or wildlife species, threaten to eliminate a plant or animal community, restrict the range of a rare or endangered plant or animal, or eliminate important examples of local or California history or prehistory.

None of the environmental issue areas discussed above identified any potentially significant cumulative impacts from the proposed project. Cumulative impacts were analyzed based on land use projections, compliance with adopted plans, statutes, and ordinances, and currently proposed projects. All potential cumulative impacts of the proposed project would be less than significant for all checklist items.

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## **F. MITIGATION MEASURES AND IMPROVEMENT MEASURES**

### **Mitigation Measure M-AQ-1: Building Air Filtration and Ventilation Requirements**

To reduce the potential for exposure of building occupants to PM<sub>2.5</sub> and other toxic air contaminants, the project shall be designed to incorporate a mechanical ventilation system with air filtration that is capable of removing 80 percent of ambient PM<sub>2.5</sub>. This level of filtration requires filters with at least a MERV (minimum efficiency reporting value) rating of 12, in accordance with the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 52.2 (equivalent to approximately ASHRAE Standard 52.1 Dust Spot 85%). In addition, the project's air intakes shall be on the eastern, western, or southern half of the building, as specified in the Air Quality Technical Report, to increase the separation from traffic emissions on Lombard Street. The ventilation system shall be designed by an engineer certified by ASHRAE, who shall provide a written report documenting that the system offers the best available technology. In addition to installation of air filtration, the project sponsor shall present a plan that ensures an ongoing maintenance plan for the ventilation and filtration systems.

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## **G. PUBLIC NOTICE AND COMMENTS**

On June 29, 2010, the Planning Department mailed a Notice of Project Receiving Environmental Review to property owners within 300 feet of the project site, adjacent tenants, and other potentially

interested parties. The Planning Department received several comments in response to the notice. Concerns and issues raised in the public comments on the environmental review are discussed in the corresponding topical sections of this Initial Study. No significant, adverse environmental impacts from issues of concern have been identified. Comments that do not pertain to physical environmental issues and comments on the merits of the proposed project will be considered in the context of project approval or disapproval, independent of the environmental review process. While local concerns or other planning considerations may be grounds for modifying or denying the proposal, in the independent judgment of the Planning Department, there is no substantial evidence that the proposed project could have a significant effect on the environment.

The following is a consolidated list of the comments made in response to the Notice of Project Receiving Environmental Review. Reference to the corresponding topic in the Initial Study follows in italics.

**Level of CEQA Analysis**—A commenter expressed concern that the proposed project would result in significant impacts that would require the preparation of an Environmental Impact Report.

*The analysis in this Initial Study did not identify any significant environmental impacts that, under CEQA, would warrant the preparation of an Environmental Impact Report.*

**Project Alternatives**—The proposed project could result in significant adverse impacts, so an analysis of alternative locations is warranted.

*CEQA requires an analysis of alternatives when it is necessary to prepare an Environmental Impact Report due to the potential for significant and unavoidable impacts. No significant impacts were identified that would warrant the preparation of an EIR. CEQA does not require an alternatives analysis as part of a Negative Declaration or Mitigated Negative Declaration.*

**LEED Certification**—Although not required under CEQA, the proposed project should pursue the LEED certification.

*See Proposed Project, beginning on page 4.*

**Public Outreach**—Notification about the proposed project must be published in the newspapers. It is likely that the notice did not get to all the residents within the 300-foot radius of the project site.

*See the first paragraph of this Section G, Public Notice and Comment, on page 104.*

**Compatibility with Existing Zoning and Plans**—The proposed project is inconsistent with existing plans and policies.

*See Section C, Compatibility of Existing Zoning and Plans, beginning on page 22.*

**Zoning and Conditional Use**—The proposed building would require a change in NC-3 zoning to accommodate 25 permanent residents. The change in zoning and in use from a tourist hotel to a group housing constitutes a significant alteration in the character of the neighborhood.

*See Section C, Compatibility of Existing Zoning and Plans, and Land Use, beginning on page 22.*

**Aesthetics**—The proposed project would alter the visual character of the project site and the immediate vicinity. The proposed project would increase the light and glare at the project site.

*See Aesthetics, beginning on page 30.*

**Population and Housing**—The proposed project would result in a high population density, which would result in adverse impacts on the environment.

*See Population and Housing, beginning on page 33.*

**Cultural Resources**—The building at the project site is historically significant and the proposed project would result in significant impacts on a historic resource.

*See Cultural and Paleontological Resources, beginning on page 35.*

**Traffic Impacts**—The proposed project would have adverse transportation impacts and would increase the number of vehicles.

*See Project Description, page 3, and Transportation and Circulation, beginning on page 39.*

**Emergency Access**—The proposed project does not include adequate emergency access, in compliance with the ADA.



*See Proposed Alternations, page 4, and Transportation and Circulation, beginning on page 39.*

**Parking Space**—The proposed project requires the provision of parking spaces.

*See Proposed Project, beginning on page 3, and Transportation and Circulation, beginning on page 39.*

**Loading Space**—Loading and unloading at the project site would impact vehicular and bicycle traffic.

*See Transportation and Circulation, beginning on page 39.*

**Transit Service**—The proposed project would increase demand on transit services.

*See Transportation and Circulation, beginning on page 39.*

**Pedestrians Sidewalks**—The proposed project would result in overcrowding on the sidewalk near the building.

*See Transportation and Circulation, beginning on page 39.*

**Existing Ambient Noise**—The proposed project would be in an area with high levels of ambient noise.

*See Noise, beginning on page 50.*

**Operational Noise**—The proposed project would increase ambient noise in the project vicinity.

*See Noise, beginning on page 50.*

**Health Risk**—There is a potential health risk concern from the proximity of the project site to US Highway 101.

*See Air Quality, beginning on page 54.*

**Greenhouse Gas Emissions**—The proposed project would result in an increase in GHG emissions.

*See Greenhouse Gas Emissions, beginning on page 66.*

**Recreation**—The proposed project does not include an outdoor space. The proposed project would result in physical deterioration and increase the use of existing recreation resources.

*See Recreation, beginning on page 74.*

**Water and Wastewater Systems and Solid Waste**—The proposed project would increase the demand on water and wastewater systems. The proposed project would result in a net increase in solid waste.

*See Utilities and Service Systems, beginning on page 76.*

**Public Services**—The proposed project would increase the demand on public services, in particular police emergency calls.

*See Public Services, beginning on page 79.*

**Seismic Risks**—The proposed project requires a study assessing the geology and seismicity at the project site. There is a risk of liquefaction at the project site.

*See Geology and Soils, beginning on page 83.*

**Flood Risk**—There is a potential of flood risk at the project site. The project site elevation is just a few feet above sea level.

*See Hydrology and Water Quality, beginning on page 87.*

**Fire Hazards**—The proposed project would be at a high risk of fire hazards, and the site plans do not show compliance with the Building Fire Code.

*See Public Services, beginning on page 81. In addition, the project would be required to comply with all regulations of the 2001 California Fire Code.*

**Hazardous Materials**—The building at the project site may contain PCBs (polychlorinated biphenyl) and LBP (lead-based paints).

*See Hazards and Hazardous Materials, beginning on page 91.*

**Cumulative Impacts**—Construction of the proposed project would overlap with that of the Presidio Park project. The proposed project would contribute to cumulative impacts on public services. It also would contribute to cumulative effects of waivers of zoning laws and consistency with plans and policies, transportation and traffic, and cultural and aesthetic resources.

*The Presidio Park project is located over one mile from the project site and project effects would not be related.*

In addition, there were public comments on issues that are not relevant to environmental analysis under CEQA. These comments included the request for preparation of an Institutional Master Plan, the viability of the proposed project with only one live-in manager and with the proposed amenities, concerns about the hotel closure, and cost of the proposed project. Issues not related to the physical environment but on the merits of the proposed project are not relevant to the environmental review process under CEQA; however, decision makers may take them into account during the project approval process.



## H. DETERMINATION

On the basis of this Initial Study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.



Bill Wycko  
Environmental Review Officer

DATE May 23, 2011

